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2022-CC09988 - TINA POYNTER-ABELL V. 3M COMPANY, ET. AL. (E-CASE)

Case Parties & ACMANIES

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Affidavit of Service on 3M Company.

Filed By: ANDREW KELLEY SMITH

On Behalf Of: TINA POYNTER-ABELL

Notice of Service

Affidavit of Service for Dynax Corporation. **Filed By:** ANDREW KELLEY SMITH

10/19/2020 U Jury Trial Scheduled

Scheduled For: 08/02/2021; 9:00 AM; REX M BURLISON; City of St. Louis

Affidavit of Service on Corteva; Electronic Filing Certificate of Service.

Filed By: JONATHAN MESLE SOPER On Behalf Of: TINA POYNTER-ABELL

Notice of Service

Affidavit of Service on El Dupont De Nemours; Electronic Filing Certificate of Service.

Filed By: JONATHAN MESLE SOPER

Notice of Service

Affidavit of Service on The Chemours Company; Electronic Filing Certificate of Service.

Notice of Service

Affidavit of Service on Raytheon; Electronic Filing Certificate of Service.

Filed By: JONATHAN MESLE SOPER

Notice of Service

Affidavit of Service on UTC Fire Security; Electronic Filing Certificate of Service.

Filed By: JONATHAN MESLE SOPER

Notice of Service

Affidavit of Service on Tyco; Electronic Filing Certificate of Service.

Filed By: JONATHAN MESLE SOPER

Corporation Served

Document ID - 20-SMCC-14242; Served To - TYCO FIRE PRODUCTS L.P.; Server - ; Served Date - 01-OCT-20; Served Time - 00:00:00; Service Type - Sheriff Department; Reason Description - Served;

Service Text - BONNIE LOVE

Corporation Served

Document ID - 20-SMCC-14243; Served To - UTC FIRE AND SECURITY AMERICAS CORPORATION INC; Server - ; Served Date - 01-OCT-20; Served Time - 00:00:00; Service Type - Sheriff Department;

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2:	21-	cv-00365-RMG Date Filed 11/02/20 Entry Number 1-1 Page 3 of 103
		Summons Issued-Circuit
		Document ID: 20-SMCC-14242, for TYCO FIRE PRODUCTS L.P
		Summons Issued-Circuit
		Document ID: 20-SMCC-14241, for THE CHEMOURS COMPANY FC, LLC.
		Summons Issued-Circuit Document ID: 20-SMCC-14240, for SENTINEL EMERGENCY SOLUTIONS, LLC.
		Summons Issued-Circuit
		Document ID: 20-SMCC-14239, for RAYTHEON TECHNOLOGIES CORPORATION.
		Document ID: 20-SMCC-14238, for LEO M. ELLEBRACHT COMPANY.
		Summons Issued-Circuit
		Document ID: 20-SMCC-14237, for E I DUPONT DE NEMOURS INC.
		Summons Issued-Circuit
	_	Document ID: 20-SMCC-14236, for CORTEVA, INC
		Summons Issued-Circuit
		Document ID: 20-SMCC-14235, for 3M COMPANY.
		Corporation Served Document ID - 20-SMCC-14235; Served To - 3M COMPANY; Server - ; Served Date - 02-OCT-20;
		Served Time - 00:00:00; Service Type - Special Process Server; Reason Description - Served
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09/25/2020		Note to Clerk eFiling Filed By: ANDREW KELLEY SMITH
		Request Filed
		Motion for Private Process Server.
		Filed By: ANDREW KELLEY SMITH
		On Behalf Of: TINA POYNTER-ABELL
09/24/2020		Filing Info Sheet eFiling
		Filed By: ANDREW KELLEY SMITH
		Note to Clerk eFiling
		Filed By: ANDREW KELLEY SMITH
		Pet Filed in Circuit Ct
		Abell Petition.
		Filed By: ANDREW KELLEY SMITH
		On Behalf Of: TINA POYNTER-ABELL
	\Box	Judge Assigned

IN THE CIRCUIT COURT OF THE CITY OF ST. LOUIS STATE OF MISSOURI

TINA POYNTER-ABELL , AS SPOUSE OF AND ON BEHALF OF DECEDENT ROBERT ABELL 6328 Tholozan Ave.)))
St. Louis, MO 63109) Case No.:
Plaintiff,))) Division:
v.)
3M COMPANY f/k/a MINNESOTA MINING AND MANUFACTURING Serve: Registered Agent CSC-Lawyers Incorporating Services Company 221 Bolivar Street Jefferson City, Missouri 65101	<pre>) JURY TRIAL DEMANDED))))))))))</pre>
and)
BUCKEYE FIRE EQUIPMENT COMPANY Serve: Registered Agent)))
A Haon Corporate Agent, Inc. 29225 Chagrin Blvd., Ste. 350 Pepper Pike, OH 44122)))
and)
CHEMGUARD, INC. Serve:)))
Registered Agent CT Corporation System 1999 Bryan Street, Ste. 900 Dallas, Texas 75201)))
and)
CHUBB FIRE, LTD./CHUBB FIRE &)

	RED HAWK FIRE & SECURITY,
LLC,	•
	/I, INC.
	on Road, Ashford, Middlesex, I Kingdom TW15 1TZ
Omied	Kiliguolii I W 13 11Z
and	
anu	
CORT	TEVA, INC.,
Serve:	
	Registered Agent
	CT Corporation System
	120 South Central Avenue
	Clayton, Missouri, 63105
and	
DII P	ONTE DE MENTOLIDO INO (07)
	CONT DE NEMOURS INC. (f/k/a)
<i>DOWL</i> Serve:	DUPONT INC.)
serve.	Registered Agent
	The Corporation Trust Company
	1209 Orange Street
	Wilmington, DE 19801
and	Willington, DE 19801
anu	
DYNA	AX CORPORATION
Serve:	
	Registered Agent
	Corporate Systems, LLC
	3500 S. Dupont Highway
	Dover, Delawere 19901
and	
	U PONT DE NEMOURS INC. (f/k/a
	DUPONT, INC.) ("DOWDUPONT"),
Serve:	
	Registered Agent
	CT Corporation System
	120 South Central Avenue
	Clayton, Missouri, 63105
and	

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LEO M. ELLEBRACHT COMPANY, )
(sued individually and as successor in-
              ELLEBRACHT
                                 FIRE
interest-to
APPARATUS SERVICE, INC.,)
Serve:
      Registered Agent
      Lloyd A. Dewald
      104 Mullach Ct., Suite 1028
      Wentzville, Missouri 63385
and
NATIONAL FOAM, INC.
Serve:
      Registered Agent
      The Corporation Trust Company
      1209 Orange Street
      Wilmington, Delaware 19801
and
RAYTHEON
                     TECHNOLOGIES
CORPORATION, (sued individually and as
successor in-interest-to United Technologies
Corporation)
Serve:
      CT Corporation System
      120 South Central Ave.
      Clayton, MO 63105
and
SENTINEL
                        EMERGENCY
SOLUTIONS, LLC, (sued individually and
as successor in-interest-to BATTALION
         INC.,
                and FRANCO FIRE
THREE,
EQUIPMENT
Serve:
      Registered Agent
      Charles A. Hurth, III
      301 E. Main St.
      Union, Missouri 63084
and
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THE CHEMOURS COMPANY FC, LLC, Serve:)
Registered Agent)
CT Corporation System)
120 South Central Avenue)
Clayton, Missouri, 63105)
3)
and)
TYCO FIRE PRODUCTS L.P., (sued)
individually and as successor-in-interest to)
THE ANSUL COMPANY))
Serve:)
Registered Agent)
CT Corporation System)
120 South Central Avenue)
Clayton, Missouri, 63105)
•)
and	ĺ
)
UTC FIRE & SECURITY AMERICAS	ĺ
CORPORATION, INC.	ĺ
Serve:)
Registered Agent)
CT Corporation System)
120 South Central Avenue)
Clayton, Missouri, 63105)
Ciaj (011, 11110000111, 00100	,

and

JOHN DOE DEFENDANTS 1-20 Defendants.

PETITION

COMES NOW Plaintiff TINA POYNTER-ABELL as Plaintiff Ad Litem, and as Representative for all persons identified by § 537.080 R.S.Mo, and as the surviving Spouse of Robert Abell, for her claims and causes of action against the Defendants, state and allege for their claims and causes of action against the Defendants, upon information and belief, states:

PARTIES

Α. PLAINTIFF AND DECEDENT

- Plaintiff Tina Poynter-Abell is a resident of the State of Missouri residing in St. 1. Louis, Missouri. Plaintiff Tina Poynter-Abell was Decedent Robert Abell's wife and a Class I Beneficiary entitled to bring this action against Defendants for the wrongful death of Robert Abell.
- 2. Decedent Robert Abell was a resident of the State of Missouri residing in St. Louis, Missouri. Decedent worked as a firefighter for many years, including all or portions of the year 1991 and continuously thereafter until the end of 2016.
- 3. For the entirety of this time, Mr. Abell's service as a Firefighter was for and in the City of St. Louis, Missouri.
- 4. Decedent was diagnosed with diffuse large B-cell Central Nervous System Lymphoma (hereinafter Non-Hodgkin's Lymphoma or "NHL") and subsequently died on September 24, 2017.
- 5. Plaintiff brings this action pursuant to § 537.080 R.S.Mo. Plaintiff is a member of the class of individuals authorized to pursue a wrongful death claim.

В. **DEFENDANTS**

- 6. Defendant, 3M Company, f/k/a Minnesota Mining and Manufacturing Company, ("3M"), is a Delaware corporation and does business throughout the United States. 3M has its principal place of business at 3M Center, St. Paul, Minnesota 55133.
- 7. 3M designed, marketed, developed, manufactured, distributed, released, trained users, produced instructional materials, promoted, sold and/or otherwise handled and/or used AFFF containing PFAS that are used in firefighting training and response exercises which are the subject of this Petition.
- 8. Defendant Buckeye Fire Equipment Company ("Buckeye") is an Ohio corporation and does business throughout the United States. Buckeye has its principal place of business at 110

- 9. Buckeye designed, marketed, developed, manufactured, distributed, released, trained users, produced instructional materials, sold and/or otherwise handled and/or used AFFF containing PFAS that are used in firefighting training and response exercises which are the subject of this Complaint.
- 10. Defendant Chemguard, Inc. ("Chemguard") is a Wisconsin corporation and does business throughout the United States. Chemguard has its principal place of business at One Stanton Street, Marinette, Wisconsin 54143.
- Chemguard designed, marketed, developed, manufactured, distributed, released, 11. trained users, produced instructional materials, sold and/or otherwise handled and/or used AFFF containing PFAS that are used in firefighting training and response exercises which are the subject of this Petition.
- 12. Defendant Chubb Fire, Ltd. is a foreign private limited company, with offices at Littleton Road, Ashford, Middlesex, United Kingdom TW15 1TZ. Upon information and belief, Chubb is registered in the United Kingdom with a registered number of 134210. Upon information and belief, Chubb is or has been composed of different subsidiaries and/or divisions, including but not limited to, Chubb Fire & Security Ltd., Chubb Security, PLC, Red Hawk Fire & Security, LLC, and/or Chubb National Foam, Inc. Defendant Chubb Fire, Ltd. Chubb Fire & Security Ltd., Chubb Security, PLC, Red Hawk Fire & Security, LLC, and/or Chubb National Foam, Inc. are referred to collectively as ("Chubb").
- 13. Defendant Chubb is a corporation doing business in several U.S. states, including Missouri, with its principal place of business and headquarters located at Littleton Road, Ashford, Middlesex, United Kingdom TW15 1TZ. Defendant Chubb may be served with process at its

headquarters through an international service company. The United States and the United Kingdom are both parties to the Hague Convention on the Service Abroad of Judicial and Extra-Judicial Documents in Civil or Commercial Matters, TIS#10072 (U.S. Treaties and other International Acts) and 20 UST 361 (U.S. Treaties and other International Agreements). Service in accordance with this international treaty is an acceptable method for serving documents in the United Kingdom.

Date Filed 11/02/20

- 14. Defendant Corteva, Inc. ("Corteva") is a Delaware Corporation that conducts business throughout the United States. Its principal place of business is 974 Center Rd, Wilmington, Delaware 19805.
- Corteva designed, marketed, developed, manufactured, distributed, released, 15. trained users, produced instructional materials, sold, and/or otherwise handled and/or used AFFF containing PFAS that are the subject of this Petition.
- 16. Defendant Du Pont de Nemours Inc. (f/k/a DowDuPont, Inc.) ("DowDuPont"), is a Delaware corporation and does business throughout the United States. DowDuPont, has its principal place of business at 974 Centre Road, Wilmington, Delaware 19805 and 2211 H.H. Dow Way, Midland, Michigan 48674.
- 17. DowDuPont designed, marketed, developed, manufactured, distributed, released, trained users, produced instructional materials, sold, and/or otherwise handled and/or used AFFF containing PFAS that are the subject of this Petition.
- 18. Defendant Dynax Corporation ("Dynax") is a Delaware Corporation that conducts business throughout the United States. Its principal place of business is 103 Fairview Park Drive, Elmsford, New York, 10523-1544.
 - 19. Dynax designed, marketed, developed, manufactured, distributed, released, trained

users, produced instructional materials, sold, and/or otherwise handled and/or used AFFF containing PFAS that are the subject of this Petition.

- 20. Defendant E. I. du Pont de Nemours and Company ("DuPont"), is a Delaware corporation and does business throughout the United States. DuPont has its principal place of business at 1007 Market Street, Wilmington, Delaware 19898.
- 21. DuPont designed, marketed, developed, manufactured, distributed, released, trained users, produced instructional materials, sold, and/or otherwise handled and/or used AFFF containing PFAS that are the subject of this Petition.
- 22. The Leo M. Ellebracht Company, sued individually and as successor in interest to Ellebracht Fire Apparatus Service, Inc., is a Missouri Corporation with its principle place of business located at 104 Mullach Ct., Ste. 1028, Wentzville, Missouri, 63385, United States, it can be served at its Registered Agent: Lloyd A. Dewald, 104 Mullach Ct., Suite 1028, Wentzville, Missouri, 63385, United States.
- 23. At all times relevant hereto, the Leo M. Ellebracht Company and or its predecessors in interest were an authorized dealer of one or more of the aqueous film-forming foams ("AFFF") product(s) more fully below, and Leo M. Ellebracht Company, and its predecessors in interest in fact did sell, deliver or cause to be delivered, and advertised, marketed by mailing, telephone, direct and in-person contacts, and specifically engaged in this conduct with the City of St. Louis Fire Department, and its authorized agents and employees, and did in fact provide "samples" or exemplar AFF products, specifically and personally demonstrated the usage, efficacy, storage, and other related aspects of the AFFF to the St. Louis Fire Department (the "Department") during the time in which Decedent Robert Abell was employed by the Department as a Firefighter and during the time in which he was using and exposed to such AFFF products, and provided information

- 24. Defendant National Foam, Inc. ("National Foam") is a Delaware corporation and does business throughout the United States. National Foam has its principal place of business at 350 East Union Street, West Chester, Pennsylvania 19382.
- 25. National Foam designed, marketed, developed, manufactured, distributed, released, trained users, produced instructional materials, sold and/or otherwise handled and/or used AFFF containing PFAS that are used in firefighting, training and response exercises which are the subject of this Petition.
- 26. Defendant Raytheon Technologies Corporation, sued individually and as successor in-interest-to United Technologies Corporation is a foreign corporation organized and existing under the laws of the State of Delaware and does business throughout the United States. United Technologies has its principal place of business at 8 Farm Springs Road, Farmington, Connecticut 06032.
- 27. Defendant Raytheon Technologies Corporation, sued individually and as successor in-interest-to United Technologies Corporation, and United Technologies designed, marketed, developed, manufactured, distributed, released, trained users, produced instructional materials, sold, and/or otherwise handled and/or used AFFF containing PFAS that are the subject of this Petition.
- At all times relevant hereto, Sentinel Emergency Solutions, LLC, (sued 28. individually and as successor in-interest-to Battalion Three, Inc., And Franco Fire Equipment) was a Missouri Corporation with its principal place of business in the State of Missouri, and can be served at its Registered Agent at: Charles A. Hurth, III 301 E. Main St., Union, Missouri 63084.
 - 29. At all times relevant hereto, Sentinel Emergency Solutions, LLC, and or its

predecessors in interest were an authorized dealer of one or more of the aqueous film-forming foams ("AFFF") product(s) more fully below, and Sentinel, and its predecessors in interest in fact did sell, deliver or cause to be delivered, and advertised, marketed by mailing, telephone, direct and in-person contacts, and specifically engaged in this conduct with the City of St. Louis Fire Department, and its authorized agents and employees, and did in fact provide "samples" or exemplar AFF products, specifically and personally demonstrated the usage, efficacy, storage, and other related aspects of the AFFF to the St. Louis Fire Department (the "Department") during the time in which Decedent Robert Abell was employed by the Department as a Firefighter and during the time in which he was using and exposed to such AFFF products, and provided information concerning the proper and "safe" use and handling of such products.

- 30. Defendant The Chemours Company FC, LLC ("Chemours FC"), is a Delaware corporation and does business throughout the United States. Chemours has its principal place of business 1007 Market Street, Wilmington, Delaware 19898.
- 31. Chemours FC designed, marketed, developed, manufactured, distributed, released, trained users, produced instructional materials, sold, and/or otherwise handled and/or used AFFF containing PFAS that are the subject of this Petition.
- 32. Defendant Tyco Fire Products, LP, as successor-in-interest to The Ansul Company ("Tyco"), is a Delaware limited partnership and does business throughout the United States. Tyco has its principal place of business at One Stanton Street, Marinette, Wisconsin 54143. Tyco manufactured and currently manufactures the Ansul brand of products, including Ansul brand AFFF containing PFAS.
- Tyco is the successor in interest to the corporation formerly known as The Ansul 33. Company ("Ansul"). At all times relevant, Tyco/Ansul designed, marketed, developed,

manufactured, distributed released, trained users, produced instructional materials, sold and/or otherwise handled and/or used AFFF containing PFAS that are used in firefighting, training and response exercises which are the subject of this Petition.

- 34. Defendant UTC Fire & Security Americas Corporation, Inc. (f/k/a GE Interlogix, Inc.) ("UTC") is a North Carolina corporation and does business throughout the United States. UTC has principal place of business at 3211 Progress Drive, Lincolnton, North Carolina 28092. Upon information and belief, Kidde-Fenwal, Inc. is part of the UTC Climate Control & Security unit of United Technologies Corporation.
- 35. UTC designed, marketed, developed, manufactured, distributed, released, trained users, produced instructional materials, sold, and/or otherwise handled and/or used AFFF containing PFAS that are the subject of this Complaint.
- 36. Defendants John Does 1-20 all designed, marketed, developed, manufactured, distributed released, trained users, produced instructional materials, sold and/or otherwise handled and/or used AFFF containing PFAS that are used in firefighting, training and response exercises which are the subject of this Petition that caused and/or contributed to the injuries alleged below, the identities of which are currently unknown to Plaintiffs.

AGENCY

37. At all relevant times, Defendants were acting by and through their actual and/or ostensible employees and agents. Whenever reference in this Petition is made to any act or transaction by Defendants such allegation shall be deemed to mean that the principals, officers, directors, employees, agents and/or representatives of such Defendants committed, knew of, performed, authorized, ratified and/or directed such act or transaction on behalf of such Defendants while actively engaged in the scope of their duties.

JURISDICTION AND VENUE

- 38. This Court has subject matter jurisdiction pursuant to R.S.Mo § 506.500 because the tortious acts upon which Plaintiff's claims are based occurred within the State of Missouri, and because Plaintiff is a Missouri resident and certain defendants, as alleged above were, at all times relevant hereto, Missouri corporations.
- 39. Defendants Leo M. Ellebracht Company and Sentinel are Missouri corporations and therefore citizens of the State of Missouri. Because Plaintiff is a citizen of the State of Missouri complete diversity does not exist in this matter and this case cannot be properly removed to federal court.
- 40. Additionally, all Defendants named herein have routine and systematic business conducted in the State of Missouri and are subject to Missouri's long arm statutes, R.S.MO. §506.500. Moreover, the non-resident defendants have sufficient minimum contacts with this State by conducting substantial business in the State of Missouri, marketing and selling their products for profit in the State of Missouri, and directing their activities toward the residents of the State of Missouri. Each Defendant is also subject to personal and subject matter jurisdiction in the State of Missouri because of Decedent Robert Abell sustaining personal injuries resulting in his wrongful death in this State.
- 41. The damages sought by Plaintiffs, exclusive of interests and costs, exceed the minimum jurisdictional limits of the Court.
- 42. Venue is proper in this Court pursuant to R.S.Mo § 508.010 because Plaintiff's causes of action accrued in the City of St. Louis, St. Louis County, Missouri.

ALLEGATIONS COMMON TO ALL COUNTS

43. Plaintiff brings this action for damages for the wrongful death of Robert Abell

resulting from exposure to aqueous film-forming foams ("AFFF") containing the toxic chemicals collectively known as per and polyfluoroalkyl substances ("PFAS"). PFAS includes, but is not limited to, perfluorooctanoic acid ("PFOA") and perfluorooctane sulfonic acid ("PFOS") and related chemicals including those that degrade to PFOA and/or PFOS.

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- Aqueous Film-Forming Foam ("AFFF") is a combination of chemicals used to 44. extinguish hydrocarbon fuel-based fires.
- 42. AFFF-containing fluorinated surfactants have better firefighting capabilities than water due to their surfactant-tension lowering properties which allow the compound(s) to extinguish fire by smothering, ultimately starving it of oxygen.
- 43. AFFF is a Class-B firefighting foam. It is mixed with water and used to extinguish fires that are difficult to fight, particularly those that involve petroleum or other flammable liquids.
- 44. Defendants designed, marketed, developed, manufactured, distributed, released, trained users, produced instructional materials, promoted, sold, and/or otherwise handled AFFF containing toxic PFAS that were used by entities around the country, including military, county, and municipal firefighting departments.
- 45. Defendants have each designed, marketed, developed, manufactured, distributed, released, trained users on, produced instructional materials for, sold, and/or otherwise handled and/or used AFFF containing PFAS, in such a way as to cause the contamination of Plaintiff's blood and/or body with PFAS, and the resultant biopersistence and bioaccumulation of such PFAS in the blood and/or body of Plaintiff.
- 46. AFFF was introduced commercially in the mid-1960s and rapidly became the primary firefighting foam in the United States and in other parts of the world. It contains PFAS,

PFOA.

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- 47. PFAS are a family of chemical compounds containing fluorine and carbon atoms.
- 48. PFAS have been used for decades in the manufacture of AFFF. The PFAS family of chemicals are entirely human-made and do not naturally occur or otherwise exist.
- 49. Prior to commercial development and large-scale manufacture and use of AFFF containing PFAS, no such PFAS had been found or detected in human blood.

AFFF / PFAS HAZARDOUS EFFECTS ON HUMANS Α.

- 50. AFFF and its components are associated with a wide variety of adverse health effects in humans.
- Exposure to Defendants' AFFF has been linked to serious medical conditions 51. including, but not limited to, kidney cancer, testicular cancer, testicular tumors, pancreatic cancer, prostate cancer, leukemia, lymphoma, bladder cancer, thyroid disease and infertility.
- 52. By at least the end of the 1960s, animal toxicity testing performed by Defendants manufacturing and/or using PFAS indicated that exposure to such materials, including at least PFOA, resulted in various adverse health effects among multiple species of laboratory animals, including toxic effects to the liver, testes, adrenals, and other organs and bodily systems.
- By at least the end of the 1960s, additional research and testing performed by 53. Defendants manufacturing and/or using PFAS indicated that such materials, including at least PFOA, because of their unique chemical structure, were resistant to environmental degradation and would persist in the environment essentially unaltered if allowed to enter the environment.
- 54. By at least the end of the 1970s, additional research and testing performed by Defendants manufacturing and/or using PFAS indicated that one or more such materials,

- Defendants manufacturing and/or using PFAS indicated that at least one such PFAS, PFOA, had caused Leydig cell (testicular) tumors in a chronic cancer study in rats, resulting in at least one such Defendant, DuPont, classifying such PFAS internally as a confirmed animal carcinogen and possible human carcinogen.
- It was understood by Defendants by at least the end of the 1980s that a chemical 56. that caused cancer in animal studies must be presumed to present a cancer risk to humans, unless the precise mechanism of action by which the tumors were caused was known and would not occur in humans.
- 57. By at least the end of the 1980s, scientists had not determined the precise mechanism of action by which any PFAS caused tumors. Therefore, scientific principles of carcinogenesis classification mandated Defendants presume any such PFAS material that caused tumors in animal studies could present a potential cancer risk to exposed humans.
- 58. By at least the end of the 1980s, additional research and testing performed by Defendants manufacturing and/or using PFAS, including at least DuPont, indicated that elevated incidence of certain cancers and other adverse health effects, including elevated liver enzymes and birth defects, had been observed among workers exposed to such materials, including at least PFOA, but such data was not published, provided to governmental entities as required by law, or otherwise publicly disclosed at the time.

- By at least the end of the 1980s, Defendants, including at least 3M and DuPont, 59. understood that, not only did PFAS, including at least PFOA and PFOS, get into and persist and accumulate in the human blood and in the human body, but that once in the human body and blood, particularly the longer-chain PFAS, such as PFOS and PFOA, had a long half-life. Meaning that it would take a very long time before even half of the material would start to be eliminated, which allowed increasing levels of the chemicals to build up and accumulate in the blood and/or body of exposed individuals over time, particularly if any level of exposure continued.
- 60. By at least the end of the 1990s, additional research and testing performed by Defendants manufacturing and/or using PFAS, including at least 3M and DuPont, indicated that at least one such PFAS, PFOA, had caused a triad of tumors (Leydig cell (testicular), liver, and pancreatic) in a second chronic cancer study in rats.
- 61. By at least the end of the 1990s, the precise mechanism(s) of action by which any PFAS caused each of the tumors found in animal studies had still not been identified, mandating that Defendants continue to presume that any such PFAS that caused such tumors in animal studies could present a potential cancer risk to exposed humans.
- 62. By at least 2010, additional research and testing performed by Defendants manufacturing and/or using PFAS, including at least 3M and DuPont, revealed multiple potential adverse health impacts among workers exposed to such PFAS, including at least PFOA, such as increased cancer incidence, hormone changes, lipid changes, and thyroid and liver impacts.
- 63. When the United States Environmental Protection Agency ("USEPA") and other state and local public health agencies and officials first began learning of PFAS exposure in the United States and potential associated adverse health effects, Defendants repeatedly assured and

- 64. After the USEPA and other entities began asking Defendants to stop manufacturing and/or using certain PFAS, Defendants began manufacturing and/or using and/or began making and/or using more of certain other and/or "new" PFAS, including PFAS materials with six or fewer carbons, such as GenX (collectively "Short-Chain PFAS").
- 65. Defendants manufacturing and/or using Short-Chain PFAS, including at least DuPont and 3M, are aware that one or more such Short-Chain PFAS materials also have been found in human blood.
- 66. By at least the mid-2010s, Defendants, including at least DuPont and Chemours, were aware that at least one Short-Chain PFAS had been found to cause the same triad of tumors (Leydig (testicular), liver, and pancreatic) in a chronic rat cancer study as had been found in a chronic rat cancer study with a non-Short-Chain PFAS.
- 67. Research and testing performed by and/or on behalf of Defendants making and/or using Short-Chain PFAS indicates that such Short-Chain PFAS materials present the same, similar, and/or additional risks to human health as had been found in research on other PFAS materials, including cancer risk.
- 68. Nevertheless, Defendants repeatedly assured and represented to governmental entities and the public (and continue to do so) that the presence of PFAS, including Short-Chain PFAS, in human blood at the levels found within the United States present no risk of harm and is of no legal, toxicological, or medical significance of any kind.
- At all relevant times, Defendants, individually and/or collectively, possessed the 69. resources and ability but have intentionally, purposefully, recklessly, and/or negligently chosen

not to fund or sponsor any study, investigation, testing, and/or other research of any kind of the nature that Defendants claim is necessary to confirm and/or prove that the presence of any one and/or combination of PFAS in human blood causes any disease and/or adverse health impact of any kind in humans, presents any risk of harm to humans, and/or is of any legal, toxicological, or medical significance to humans, according to standards Defendants deem acceptable.

- 70. Even after an independent science panel, known as the "C8 Science Panel," publicly announced in the 2010s that human exposure to 0.05 parts per billion or more of one PFAS, PFOA, had "probable links" with certain human diseases, including kidney cancer, testicular cancer, ulcerative colitis, thyroid disease, preeclampsia, and medically-diagnosed high cholesterol, Defendants repeatedly assured and represented to governmental entities, their customers, and the public (and continue to do so) that the presence of PFAS in human blood at the levels found within the United States presents no risk of harm and is of no legal, toxicological, or medical significance of any kind, and have represented to and assured such governmental entities, their customers, and the public (and continue to do so) that the work of the independent C8 Science Panel was inadequate.
- 71. At all relevant times, Defendants shared and/or should have shared among themselves all relevant information relating to the presence, biopersistence, and bioaccumulation of PFAS in human blood and associated toxicological, epidemiological, and/or other adverse effects and/or risks.
- 72. As of the present date, blood serum testing and analysis by Defendants, independent scientific researchers, and/or government entities has confirmed that PFAS materials are clinically demonstrably present in approximately 99% of the current population of the United States.

- 73. There is no naturally-occurring "background," normal, and/or acceptable level or rate of any PFAS in human blood, as all PFAS detected and/or present in human blood is present and/or detectable in such blood as a direct and proximate result of the acts and/or omissions of Defendants.
- 74. At all relevant times, Defendants, through their acts and/or omissions, controlled, minimized, trivialized, manipulated, and/or otherwise influenced the information that was published in peer-review journals, released by any governmental entity, and/or otherwise made available to the public relating to PFAS in human blood and any alleged adverse impacts and/or risks associated therewith, effectively preventing Plaintiff from discovering the existence and extent of any injuries/harm as alleged herein.
- 75. At all relevant times, Defendants, through their acts and/or omissions, took steps to attack, challenge, discredit, and/or otherwise undermine any scientific studies, findings, statements, and/or other information that proposed, alleged, suggested, or even implied any potential adverse health effects or risks and/or any other fact of any legal, toxicological, or medical significance associated with the presence of PFAS in human blood.
- 76. At all relevant times, Defendants, through their acts and/or omissions, concealed and/or withheld information from their customers, governmental entities, and the public that would have properly and fully alerted Plaintiff to the legal, toxicological, medical, or other significance and/or risk from having any PFAS material in Plaintiff's blood.
- 77. At all relevant times, Defendants encouraged the continued and even further increased use of PFAS by their customers and others, including but not limited to the manufacture, use, and release, of AFFF containing PFAS and/or emergency responder protection gear or equipment coated with materials made with or containing PFAS, and tried to encourage

and foster the increased and further use of PFAS in connection with as many products/uses/and applications as possible, despite knowledge of the toxicity, persistence, and bioaccumulation concerns associated with such activities.

- 78. To this day, Defendants deny that the presence of any PFAS in human blood, at any level, is an injury or presents any harm or risk of harm of any kind, or is otherwise of any legal, toxicological, or medical significance.
- 79. To this day, Defendants deny that any scientific study, research, testing, or other work of any kind has been performed that is sufficient to suggest to the public that the presence of any PFAS material in human blood, at any level, is of any legal, toxicological, medical, or other significance.
- 80. Defendants, to this day, affirmatively assert and represent to governmental entities, their customers, and the public that there is no evidence that any of the PFAS found in human blood across the United States causes any health impacts or is sufficient to generate an increased risk of future disease sufficient to warrant diagnostic medical testing, often referring to existing studies or data as including too few participants or too few cases or incidents of disease to draw any scientifically credible or statistically significant conclusions.
- 81. Defendants were and/or should have been aware, knew and/or should have known and/or foresaw or should have foreseen that their design, marketing, development, manufacture, distribution, release, training and response of users, production of instructional materials, sale and/or other handling and/or use of AFFF containing PFAS would result in the contamination of the blood and/or body of Plaintiff with PFAS, and the biopersistence and bioaccumulation of such PFAS in his blood and/or body.
 - 82. Defendants were and /or should have been aware, or knew and/or should have

known, and/or foresaw or should have foreseen that allowing PFAS to contaminate the blood and/or body of Plaintiff would cause injury, irreparable harm, and/or unacceptable risk of such injury and/or irreparable harm to Plaintiff.

83. Defendants did not seek or obtain permission or consent from Plaintiff before engaging in such acts and/or omissions that caused, allowed, and/or otherwise resulted in Plaintiff's exposure to AFFF and the contamination of Plaintiff's blood and/or body with PFAS materials, and resulting biopersistence and bioaccumulation of such PFAS in his blood and/or body.

B. DEFENDANTS' HISTORY OF MANUFACTURING AND SELLING AFFF

- 84. 3M began producing PFOS and PFOA by electrochemical fluorination in the 1940s. In the 1960s, 3M used its fluorination process to develop AFFF.
 - 85. 3M manufactured, marketed, and sold AFFF from the 1960s to the early 2000s.
- 86. National Foam and Tyco/Ansul began to manufacture, market, and sell AFFF in the 1970s.
 - 87. Buckeye began to manufacture, market, and sell AFFF in the 2000s.
- 88. In 2000, 3M announced it was phasing out its manufacture of PFOS, PFOA, and related products, including AFFF. 3M, in its press release announcing the phase out, stated "our products are safe," and that 3M's decision was "based on [its] principles of responsible environment management." 3M further stated that "the presence of these materials at [] very low levels does not pose a human health or environmental risk." In communications with the EPA at that time, 3M also stated that it had "concluded that...other business opportunities were more deserving of the company's energies and attention..."

- 89. Following 3M's exit from the AFFF market, the remaining Defendants continued to manufacture and sell AFFF that contained PFAS and/or its precursors.
- 90. Defendants knew their customers warehoused large stockpiles of AFFF. In fact, Defendants marketed their AFFF products by touting its shelf-life. Even after Defendants fully understood the toxicity of PFAS, and their impacts to the health of humans following exposure, Defendants concealed the true nature of PFAS. While Defendants phased out production or transitioned to other formulas, they did not instruct their customers that they should not use AFFF that contained PFAS and/or their precursors. Defendants further did not act to get their harmful products off the market.
- 91. Defendants did not warn public entities, firefighter trainees who they knew would foreseeably come into contact with their AFFF products, or firefighters employed by either civilian and/or military employers that use of and/or exposure to Defendants' AFFF products containing PFAS and/or its precursors would pose a danger to human health
- 92. The Plaintiff directly used, was exposed, and/or was given AFFF to help fight fires on a regular basis.
- 93. The Plaintiff was never informed that this product was inherently dangerous. Nor was the Plaintiff warned about the known health risks associated with this product.
- 94. The Plaintiff never received or was told to use any protective gear to guard against the known dangerous propensities of this product.
- 95. Defendants have known of the health hazards associated with AFFF and/or its compounds for decades and that in their intended and/or common use would harm human health.
- 96. Information regarding AFFF and its compounds were readily accessible to each of the above-referenced Defendants for decades because each is an expert in the field of AFFF

manufacturing and/or the materials needed to manufacture AFFF, and each has detailed information and understanding about the chemical compounds that form AFFF products.

- 97. The AFFF Defendants' manufacture, distribution and/or sale of AFFF resulted in the Plaintiff and other individuals who came in contact with the chemical to develop cancer.
- The AFFF Defendants through their manufacturing, distribution and/or sale of 98. AFFF, and through their involvement and/or participation in the creation of training and instructional materials and activities, knew, foresaw, and/or should have known and/or foreseen that the Plaintiff and those similarly situated would be harmed.
- 99. The AFFF Defendants' products were unreasonably dangerous and the Defendants failed to warn of this danger.

PLAINTIFF AND DECEDENT'S INJURIES AND DAMAGES

- 100. As a direct and proximate result of Defendants' actions and failures to act, the deceased, Robert Abell, developed Non-Hodgkin's Lymphoma and died therefrom on September 24, 2017.
- 101. By virtue of Mr. Abell's untimely death, Plaintiff is lawfully entitled to such damages as are fair and just for the death and loss thus occasioned, including, but not limited to, the pecuniary losses suffered by reason of the death, funeral expenses, and the reasonable value of the services, consortium, companionship, comfort, instruction, guidance, counsel, training, and support of which Plaintiff has been deprived by reason of such death, further including past and future lost income, household services, and other value of benefits which would have been provided by the deceased.
- 102. Plaintiff further claims such damages as the deceased Robert Abell suffered between the time of injury and the time of his death and for the recovery of which the deceased

might have maintained an action had death not ensued including, but not limited to, mental anguish, physical disability, conscious pain and suffering, terror, and further considering the aggravating circumstances attendant upon the fatal injury.

- 103. Plaintiff Tina Poynter-Abell was the wife of Decedent Robert Abell and asserts a loss of consortium claim, as to compensate her fairly for the reasonable value of any loss of the services, society, companionship, and marriage relationship of her husband proximately caused by the fault of Defendants.
- 104. Plaintiff further claims punitive and exemplary damages to include, but are not limited to, the wanton, willful, callous, reckless, and depraved conduct of Defendants which entitle Plaintiff to punitive damages to punish the Defendants and to deter future wrongdoing in that the acts and omissions of Defendants have manifested such reckless and complete indifference to and conscious disregard for the safety of the public that the Decedent would have been entitled to punitive damages had he lived.

COUNT 1 Strict Liability – Design Defect (Plaintiff v. All Defendants)

- 105. Plaintiff incorporates by reference the foregoing statements and allegations as though fully set forth herein.
- 106. The Defendants were engaged in designing, manufacturing, marketing, selling, and distribution of AFFF.
- 107. When Robert Abell was exposed to the Defendants' AFFF products during the course of his employment, the AFFF was being used for the combatting of fires and training protocols, and other related uses as reasonably anticipated and directed by Defendants. Use of AFFF products in this way is a reasonably anticipated use of this product.

- 108. At the time of the distribution, sale and/or use of the Defendants' AFFF, said AFFF was in a defective condition and unreasonably dangerous when put to the use anticipated by Defendant, as a result of, among other things, the AFFF having the propensity to cause illnesses as enumerated more specifically above, including specifically NHL and death therefrom.
- 109. The unreasonably dangerous and defective condition of the Defendants' AFFF and the failure to warn of the dangers thereof, caused or contributed to cause the death of Robert Abell.
- 110. The unreasonably dangerous and defective condition of the Defendants AFFF and the failure to warn of the dangers thereof, caused or contributed to cause Robert Abell to develop severe, permanent, and progressive illness and disease, specifically NHL. Prior to his death, Robert Abell suffered physical pain, mental and emotional distress, and/or loss of sleep and natural rest. In addition, Robert Abell suffered loss of wages and/or earning capacity and incurred medical expenses for medical treatment, medication and medical devices.
- 111. The unreasonably dangerous and defective condition of the Defendants' AFFF and the failure to warn of the dangers thereof, caused or contributed to cause Robert Abell to develop severe degeneration of his bones due to the long-term, chronic use of steroid medication to treat his respiratory condition.
- 112. The unreasonably dangerous and defective condition of the Defendants' AFFF and the failure to warn of the dangers thereof, caused or contributed to cause Robert Abell to develop diabetes and complications from diabetes due to the long-term, chronic use of steroid medication to treat his respiratory condition.
- 113. Plaintiff, and others entitled to recover for the wrongful death of Robert Abell, suffered loss of comfort, companionship, counsel, support and other wrongful death damages as provided under Missouri law.

- 114. At the time of Defendants' distribution, sale and/or use of AFFF, they knew of the dangerous condition of AFFF and thereby showed complete indifference to and/or conscious disregard for the safety of others. The Defendants' conduct which caused this damage and death of Robert Abell was willful, wanton, and/or in reckless disregard for the rights of Plaintiff and others and damages for aggravating circumstances should be assessed against Defendant.
- 115. As a direct and proximate result of one or more of Defendants' acts or omissions, Plaintiff and Decedent were injured and suffered damages.
- 116. The conduct of Defendants as alleged herein was willful, wanton and/or in reckless disregard for the rights of Plaintiff and punitive and exemplary damages should be assessed against Defendants.

WHEREFORE, Plaintiff prays judgment against Defendants for actual damages sustained as a result of the injury to Plaintiff and Decedent, for an award of punitive damages and/or damages for aggravating circumstances; together with interest and costs of this action, and for such further relief as the Court deems fair and reasonable.

COUNT II Strict Liability in Tort -- Failure to Warn

- 117. Plaintiff incorporates by reference the foregoing statements and allegations as though fully set forth herein
- 118. Defendant processed, distributed, marketed, sold and supplied AFFF, without adequate instructions on safe use to reduce and/or eliminate exposure thereto, and/or without warnings that the AFFF was dangerous to health and life and caused severe respiratory diseases.
- 119. As a result of Defendants' failure to adequately instruct and warn of the dangerous characteristics of AFFF, the AFFF was defective and unreasonably dangerous when put to the use reasonably anticipated by Defendants.

- 120. The failure to adequately instruct and warn of the dangerous and defective condition of the Defendants' AFFF caused or contributed to cause the death of Robert Abell.
- 121. The failure to adequately instruct and warn of the dangerous and defective condition of the Defendants' AFFF caused or contributed to cause Robert Abell to develop severe, permanent, and progressive illness and disease, specifically NHL. Prior to his death, Robert Abell suffered physical pain, mental and emotional distress, and/or loss of sleep and natural rest. In addition, Robert Abell suffered loss of wages and/or earning capacity and incurred medical expenses for medical treatment, medication and medical devices.
- 122. Plaintiff, and others entitled to recover for the wrongful death of Robert Abell, suffered loss of comfort, companionship, counsel, support and other wrongful death damages as provided under Missouri law.
- 123. At the time of Defendants' distribution, sale and/or use of AFFF, it knew of the dangerous condition of AFFF and thereby showed complete indifference to and/or conscious disregard for the safety of others. The Defendants' conduct which caused this damage and death of Robert Abell was willful, wanton, and/or in reckless disregard for the rights of Plaintiff and others and damages for aggravating circumstances should be assessed against Defendant.
- 124. The dangerous and defective condition of the Defendants' product, and the Defendants' failure to warn of the dangers thereof, caused or contributed to cause Robert Abell to develop severe, permanent, and progressive damage to the lungs, severe damage to the respiratory system, and/or impairment of the ability to function resulting in his death. Robert Abell suffered physical pain, mental and emotional distress, and/or loss of sleep and natural rest. In addition, Robert Abell suffered loss of wages and/or earning capacity and had to expend money for medical treatment, medication and medical devices. Plaintiff, and others entitled to recover for the

wrongful death of Robert Abell, suffered loss of comfort, companionship, counsel, support and other wrongful death damages as provided under Missouri law.

125. At the time of the processing, distribution, marketing, sale, supply and/or use of AFFF, Defendant knew of the dangerous condition of AFFF and thereby showed complete indifference to and/or conscious disregard for the safety of others. The Defendants' conduct, which caused this damage, was willful, wanton, and/or in reckless disregard for the rights of Plaintiffs and damages for aggravating circumstances should be assessed against Defendant.

WHEREFORE, Plaintiffs pray for judgment against the Defendants, in excess of the jurisdictional limit and as determined at trial, for actual and punitive damages and/or damages for aggravating circumstances, for the costs of this action and for such further relief as the Court deems fair and reasonable in the premises.

COUNT III Negligence

- 126. Plaintiff incorporates by reference the foregoing statements and allegations as though fully set forth herein
- 127. As a manufacturer, processor, distributor, marketer, seller and supplier of AFFF, Defendants had a duty to exercise due care and the ordinary, reasonable and technical skill and competence that is required of processors, distributors, marketers, sellers, suppliers, and others in a similar situation, including, without limitation, the duty to acquire and maintain the knowledge of an expert, in processing, distribution, marketing, sale, and/or supply of products free from defects and/or latent defects; and the duty to adequately warn of product defects and/or hazards, which duty continued even after the sale of said products.
- 128. Defendants failed to use due care under the circumstances and were thereby negligent in the performance of their duties to Robert Abell and Plaintiff.

129. The negligence of Defendants caused or contributed to cause Robert Abell to develop severe, permanent, and progressive illness and disease, specifically NHL. Robert Abell suffered physical pain, mental and emotional distress, and/or loss of sleep and natural rest. In addition, Robert Abell suffered loss of wages and/or earning capacity and had to expend money for medical treatment, medication and medical devices. Plaintiff, and others entitled to recover for the wrongful death of Robert Abell, suffered loss of comfort, companionship, counsel, support and other wrongful death damages as provided under Missouri law.

Entry Number 1-1

At the time of Defendants' manufacturing, processing, distribution, marketing, selling, and supplying of AFFF, the Defendants knew of the dangerous condition of said products and thereby showed complete indifference to and/or conscious disregard for the safety of others. Defendants' conduct, which caused this damage, was willful, wanton, and/or in reckless disregard for the rights of Plaintiffs and damages for aggravating circumstances should be assessed against the Defendant.

WHEREFORE, Plaintiff prays for judgment against Defendant, in excess of the jurisdictional limit and as determined at trial, for actual and punitive damages and/or damages for aggravating circumstances, for the costs of this action and for such further relief as the Court deems fair and reasonable in the premises.

COUNT IV Aggravating Circumstances - Punitive Damages

- Plaintiff incorporates by reference the foregoing statements and allegations as 131. though fully set forth herein.
- Defendants committed one or more of the willful, wanton and malicious acts more fully set forth above which individually and/or cumulatively justify the submission of damages for aggravating circumstances in this case.

- 133. Defendants knew or had information from which, in the exercise of ordinary care, should have known that such conduct, as more fully set forth above, created a high degree of probability of severe injury, disease and death, including the disease from which Robert Abell suffered and from which he died, NHL.
- 134. The willful, wanton and malicious acts of Defendants, as more fully set forth above, evidence a complete indifference to and/or conscious disregard for the health and safety of Robert Abell, and others similarly situated, justifying the submission of damages for aggravating circumstances in this case.

WHEREFORE, Plaintiff prays for judgment against Defendants, and for damages for aggravating circumstances in such an amount as will serve to punish and deter Defendant, and others similarly situated, from engaging in like conduct.

COUNT V Wrongful Death, Pursuant To R.S.M.O § 537.080

- Plaintiff incorporates by reference the foregoing statements and allegations as 135. though fully set forth herein.
- Plaintiff makes this separate claim for the wrongful death of Decedent Robert 136. Abell, who on September 24, 2017 died as a direct and proximate result of the actions or inactions of the Defendants as set forth above, and Plaintiff, as heretofore set out, suffered damages.
- As a further direct and proximate result of the aforementioned conduct of the 137. Defendants, Plaintiff was caused to incur funeral expenses, mental anguish, suffering and bereavement both prior to and subsequent to the death of the deceased; loss of companionship, comfort, protection, care, attention, advice, counsel and guidance; loss of financial support and loss of services of the deceased to Plaintiff's actual damages.

Entry Number 1-1

138. Defendants' conduct, which caused this damage, showed complete indifference and a conscious disregard for the health and safety of others, and constitutes aggravating circumstances leading to Decedent's death.

WHEREFORE, Plaintiff prays judgment against Defendants for actual damages sustained as a result of the injury to Plaintiff, for an award of punitive damages and/or damages for aggravating circumstances; together with interest and costs of this action, and for such further relief as the Court deems fair and reasonable.

JURY TRIAL DEMAND

Plaintiff hereby requests a trial by jury. 139.

Respectfully submitted,

Date Filed 11/02/20

HUMPHREY, FARRINGTON & McCLAIN, P.C.

/s/ Andrew K. Smith

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Attorneys for Plaintiffs

IN THE CIRCUIT COURT IN THE CITY OF ST. LOUIS STATE OF MISSOURI

TINA POYNTER-ABELL, AS SPOUSE)
OF AND ON BEHALF OF DECEDENT)
ROBERT ABELL)
6328 Tholozan Ave.)
St. Louis, MO 63109) Case No.:
)
Plaintiff,)
) Division:
V.)
)
3M COMPANY f/k/a MINNESOTA)
MINING AND MANUFACTURING)
Serve:)
Registered Agent)
CSC-Lawyers Incorporating Services)
Company)
221 Bolivar Street)
Jefferson City, Missouri 65101)
)
and)
)
BUCKEYE FIRE EQUIPMENT)
COMPANY)
Serve:)
Registered Agent)
A Haon Corporate Agent, Inc.)
29225 Chagrin Blvd., Ste. 350)
Pepper Pike, OH 44122)
)
and)
)
CHEMGUARD, INC.)
Serve:)
Registered Agent)
CT Corporation System)
1999 Bryan Street, Ste. 900)
Dallas, Texas 75201)
)
and)
CHIED DIDE I TO CHIED DIDE 9)
CHUBB FIRE, LTD./CHUBB FIRE &)

LLC,	RED HAWK FIRE & SECURITY, and/or CHUBB NATIONAL M, INC.
and	
CORT Serve:	ΓEVA, INC.,
	Registered Agent C T Corporation System 120 South Central Avenue Clayton, Missouri, 63105
and	
	PONT DE NEMOURS INC. (f/k/a DUPONT INC.)
serve:	Registered Agent The Corporation Trust Company 1209 Orange Street Wilmington, DE 19801
and	William Scott
DYN A Serve:	
	Registered Agent Corporate Systems, LLC 3500 S. Dupont Highway Dover, Delaware 19901
and	
	U PONT DE NEMOURS INC. (f/k/a DUPONT, INC.) ("DOWDUPONT"),
	Registered Agent C T Corporation System 120 South Central Avenue
and	Clayton, Missouri, 63105
	M. ELLEBRACHT COMPANY, individually and as successor in-

```
interest-to
              ELLEBRACHT
                                 FIRE
APPARATUS SERVICE, INC.,)
Serve:
      Registered Agent
      Lloyd A. Dewald
      104 Mullach Ct., Suite 1028
      Wentzville, Missouri 63385
and
NATIONAL FOAM, INC.
Serve:
      Registered Agent
      The Corporation Trust Company
      1209 Orange Street
      Wilmington, Delaware 19801
and
RAYTHEON
                     TECHNOLOGIES
CORPORATION, (sued individually and as
successor in-interest-to United Technologies
Corporation)
Serve:
      C T Corporation System
      120 South Central Ave.
      Clayton, MO 63105
and
SENTINEL
                        EMERGENCY
SOLUTIONS, LLC, (sued individually and
as successor in-interest-to BATTALION
THREE, INC.,
                 and FRANCO FIRE
EQUIPMENT
Serve:
      Registered Agent
      Charles A. Hurth, III
      301 E. Main St.
      Union, Missouri 63084
and
THE CHEMOURS COMPANY FC, LLC,
Serve:
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Defendants.

MOTION FOR APPOINTMENT OF PRIVATE PROCESS SERVER

COMES NOW Plaintiff, by and through counsel, and pursuant to Local Rule 4.8 of City of St. Louis Court Rules, hereby moves for the appointment of HPS Process Service & Investigations, Inc.:

Joyce Clemmons

John Clor

Kathleen Clor

Chad Compton

Kenneth V Condrey

Sharon R Condrey

Theodore Cordasco	PPS20-0310
Cesar Corral	PPS20-0311
George H Covert	PPS20-0312
Dennis Dahlberg	PPS20-0026
Mary Dahlberg	PPS20-0027
Patricia Dambach-Cirko	PPS20-0313
Bert Daniels, Jr.	PPS20-0028
Alterck Davenport	PPS20-0314
Richard Davis	PPS20-0029
Duane D Day	PPS20-0315
Gerald R Deadwyles	PPS20-0316
Bryce Dearborn	PPS20-0317
Robert DeLacy, Jr.	PPS20-0318
Robert E DeLacy, III	PPS20-0319
Kathleen Dnunno	PPS20-0320
Marrissa Doan	PPS20-0034
Claudia Dohn	PPS20-0321
Dale Dorning	PPS20-0322
Valentina Dorning	PPS20-0323
Catherine Drake	PPS20-0324
Alex Duaine	PPS20-0325
Roland Duff	PPS20-0326
Rochelle D Earthrise	PPS20-0327
Daniel Eberle	PPS20-0328
Shawn Edwards	PPS20-0035
Jessica Ellison	PPS20-0330
Abel Emiru	PPS20-0331
Donald C Eskra, Jr.	PPS20-0332
Leticia Estrada	PPS20-0333
David S Felter	PPS20-0334
William Ferrell	PPS20-0037
Robert Finley	PPS20-0335
Stephen Folcher	PPS20-0336
Ryan D Fortune	PPS20-0337
Chris Fowler	PPS20-0338
James Frago	PPS20-0038
John Frago	PPS20-0039
Kelsey Garrett	PPS20-0582
Thomas Garrett	PPS20-0339
Andrew Garza	PPS20-0041
Charles Gay	PPS20-0340
	PPS20-0341
Richard Gerber	PPS20-0341

PPS20-0304

PPS20-0305

PPS20-0306

PPS20-0307

PPS20-0308

PPS20-0309

D 10: 1	DD000 0040
Paul Gizel	PPS20-0343
Ronda Godard	PPS20-0344
Adam Golden	PPS20-0345
Bradley Gordon	PPS20-0042
Tom Gorgone	PPS20-0044
Paul O Grimes	PPS20-0348
Charles Gunning	PPS20-0046
Aloysivs Guy, Sr.	PPS20-0583
David Hahn	PPS20-0584
Eric Hahn	PPS20-0585
Stefanie Hahn	PPS20-0586
Darnell Hamilton	PPS20-0143
Kimberly Hamilton	PPS20-0351
Natalie Hawks	PPS20-0050
Larry Haynes	PPS20-0352
Douglas Hays	PPS20-0051
Grace Hazell	PPS20-0353
Richard Heimerich, Jr.	PPS20-0354
Stephen Heitz	PPS20-0052
Charles Helms	PPS20-0356
Austen Hendrickson	PPS20-0357
Jonathan Hennings	PPS20-0358
Jesse J Hernandez	PPS20-0359
Michael Hibler	PPS20-0360
Anthonio Hightower	PPS20-0361
Cherrod T Hindsman	PPS20-0362
James Hise	PPS20-0054
Gary F Hodges	PPS20-0363
Alex Holland	PPS20-0057
Leonard Horseman	PPS20-0364
Ulonda Howard	PPS20-0365
Martin Hueckel	PPS20-0366
Damion Hugher	PPS20-0367
William Humble	PPS20-0590
Mary Hurley	PPS20-0058
George Illidge	PPS20-0368
Frank James	PPS20-0369
Matthew Jankowski	PPS20-0370
Betty Johnson	PPS20-0059
Edward Johnson	PPS20-0060
James Johnson	PPS20-0061
Jordan Johnson	PPS20-0372
Justin L Johnson	PPS20-0373

Randy Johnson	PPS20-0374
Samuel Johnson	PPS20-0375
Haile Kahssu	PPS20-0376
Kenneth Kearney	PPS20-0377
Michael Keating	PPS20-0378
Christopher Keilbart	PPS20-0591
Elizabeth A Kidd	PPS20-0379
Donna Jo King	PPS20-0371
Kenneth Klewicki	PPS20-0380
George Kotsiras	PPS20-0592
Wyman Kroft	PPS20-0381
Jo Ann Lane	PPS20-0382
Linda Langville	PPS20-0593
Eric B Layton	PPS20-0383
Kristie Lewis	PPS20-0384
John D Lichtenegger	PPS20-0385
Bert Lott	PPS20-0386
Robert Lutren	PPS20-0387
Daniel Maglothin	PPS20-0069
Matthews J Manlich	PPS20-0388
Robert Manning	PPS20-0389
Deborah Martin	PPS20-0072
Michael Martin	PPS20-0073
Ryan Martin	PPS20-0193
Susie Martin	PPS20-0390
Thomas Matthews	PPS20-0391
Casey McKee	PPS20-0076
Michael McMahon	PPS20-0392
Michael Meade	PPS20-0393
Michael Meador	PPS20-0077
Kenny Medlin	PPS20-0078
Arsalan Memon	PPS20-0396
Eric Mendenhall	PPS20-0397
Jenna Mendoza	PPS20-0398
Matthew Millhollin	PPS20-0081
Carla M Monehain	PPS20-0400
Carlos Moreno	PPS20-0401
Michael S Morrison	PPS20-0402
Zachary P. Mueller	PPS20-0596
Kelly Murski	PPS20-0403
Andrew Myers	PPS20-0087
Frederick Myers	PPS20-0088
James Myers	PPS20-0089

Stephanie Myers PPS20-0090 Paul Nardizzi PPS20-0404 Wendy Neff PPS20-0091 Christopher New PPS20-0091 Jillian Newkirk PPS20-0406 Jeremy Nicholas PPS20-0092 Michael Noble PPS20-0093 Michael C Nolon PPS20-0409 Colter Norris PPS20-0410 Dennis Norris PPS20-0411 Kody Norris PPS20-0412 Trinity Olson PPS20-0412 Craig Palmer PPS20-0413 Craig Palmer PPS20-0415 Douglas W Patterson PPS20-0415 Douglas W Patterson PPS20-0417 Jaron Perkins PPS20-0418 Anha Pham PPS20-0419 Thai Pham PPS20-0420 Bonnie Phillippi PPS20-0421 Vincent A Piazza PPS20-0421 Vincent A Piazza PPS20-0422 Brian T Pierce PPS20-0423 Timothy Pinney PPS20-0425 Craig Podgurski PPS20-0426 Nancy A Porter PPS20-0426 <		-0-
Wendy Neff Christopher New PPS20-0405 Christopher New Jillian Newkirk PPS20-0406 Jeremy Nicholas PPS20-0092 Michael Noble PPS20-0093 Michael C Nolon PPS20-0409 Colter Norris PPS20-0410 Dennis Norris PPS20-0411 Kody Norris PPS20-0412 Trinity Olson Craig Palmer PPS20-0415 Douglas W Patterson Antonio Perez PPS20-0416 Antonio Perez PPS20-0417 Jaron Perkins PPS20-0419 Thai Pham PPS20-0420 Bonnie Phillippi PPS20-0420 Bonnie Phillippi PPS20-0421 Vincent A Piazza PPS20-0421 Vincent A Piazza PPS20-0423 Timothy Pinney PPS20-0425 Craig Podgurski PPS20-0425 Craig Podgurski PPS20-0426 Nancy A Porter PPS20-0427 Andre Powell PPS20-0428 Benjamin Purses PPS20-0429 Richard Ramirez PPS20-0430 Charles Reardon PPS20-0431 Derek L Reddick PPS20-0433 Christopher Reed PPS20-0434 Edward Reed PPS20-0435 Betty G Rice PPS20-0436 Karen L Rice PPS20-0437 Cheryl Richey PPS20-0440 David M Roberts PPS20-0206	Stephanie Myers	PPS20-0090
Christopher New Jillian Newkirk PPS20-0406 Jeremy Nicholas PPS20-0092 Michael Noble PPS20-0093 Michael C Nolon PPS20-0409 Colter Norris PPS20-0410 Dennis Norris PPS20-0411 Kody Norris PPS20-0412 Trinity Olson Craig Palmer PPS20-0414 Cynthia Paris PPS20-0415 Douglas W Patterson Antonio Perez PPS20-0417 Jaron Perkins Anha Pham PPS20-0419 Thai Pham PPS20-0420 Bonnie Phillippi PPS20-0421 Vincent A Piazza PPS20-0421 Vincent A Piazza PPS20-0422 Brian T Pierce PPS20-0423 Timothy Pinney PPS20-0425 Craig Podgurski PPS20-0425 Craig Podgurski PPS20-0426 Nancy A Porter Andre Powell PPS20-0427 Andre Powell PPS20-0428 Benjamin Purses Richard Ramirez PPS20-0430 Charles Reardon PPS20-0431 Derek L Reddick PPS20-0432 Angela Reed PPS20-0433 Christopher Reed PPS20-0436 Karen L Rice PPS20-0437 Cheryl Richey PPS20-0440 David M Roberts PPS20-0206	Paul Nardizzi	PPS20-0404
Jillian Newkirk Jeremy Nicholas PPS20-0092 Michael Noble PPS20-0093 Michael C Nolon PPS20-0409 Colter Norris PPS20-0410 Dennis Norris PPS20-0411 Kody Norris PPS20-0412 Trinity Olson Craig Palmer PPS20-0414 Cynthia Paris PPS20-0415 Douglas W Patterson Antonio Perez PPS20-0417 Jaron Perkins PPS20-0418 Anha Pham PPS20-0419 Thai Pham PPS20-0420 Bonnie Phillippi PPS20-0421 Vincent A Piazza PPS20-0421 Vincent A Piazza PPS20-0422 Brian T Pierce PPS20-0423 Timothy Pinney PPS20-0425 Craig Podgurski PPS20-0425 Craig Podgurski PPS20-0426 Nancy A Porter Andre Powell PPS20-0427 Andre Powell PPS20-0429 Richard Ramirez PPS20-0430 Charles Reardon PPS20-0431 Derek L Reddick PPS20-0431 Charles Reardon PPS20-0431 Derek L Reddick PPS20-0430 Christopher Reed PPS20-0431 Edward Reed PPS20-0435 Betty G Rice PPS20-0436 Karen L Rice PPS20-0437 Cheryl Richey PPS20-0430 PPS20-0437 Terri Richards PPS20-0440 David M Roberts PPS20-0206		
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Michael C Nolon Colter Norris PPS20-0410 Dennis Norris PPS20-0411 Kody Norris PPS20-0412 Trinity Olson Craig Palmer Cynthia Paris PPS20-0415 Douglas W Patterson Antonio Perez PPS20-0417 Jaron Perkins Anha Pham PPS20-0419 Thai Pham PPS20-0420 Bonnie Phillippi PPS20-0421 Vincent A Piazza PPS20-0421 Vincent A Piazza PPS20-0422 Brian T Pierce PPS20-0423 Timothy Pinney PPS20-0425 Craig Podgurski Rocellious Pope Nancy A Porter Andre Powell PPS20-0429 Richard Ramirez PPS20-0430 Charles Reardon PPS20-0431 Derek L Reddick Angela Reed PPS20-0436 Karen L Rice PPS20-0439 Terri Richards PPS20-0440 David M Roberts PPS20-0460 PPS20-0439 PPS20-0437 Cheryl Richey PPS20-0440 David M Roberts PPS20-0206	Jeremy Nicholas	PPS20-0092
Colter Norris Dennis Norris PPS20-0411 Kody Norris PPS20-0412 Trinity Olson PPS20-0413 Craig Palmer Cynthia Paris PPS20-0415 Douglas W Patterson Antonio Perez PPS20-0417 Jaron Perkins PPS20-0418 Anha Pham PPS20-0419 Thai Pham PPS20-0420 Bonnie Phillippi PPS20-0421 Vincent A Piazza PPS20-0421 Vincent A Piazza PPS20-0423 Timothy Pinney PPS20-0423 Timothy Pinney PPS20-0425 Craig Podgurski PPS20-0425 Craig Podgurski Rocellious Pope Nancy A Porter Andre Powell PPS20-0428 Benjamin Purses PPS20-0429 Richard Ramirez PPS20-0429 Richard Ramirez PPS20-0430 Charles Reardon PPS20-0431 Derek L Reddick PPS20-0432 Angela Reed PPS20-0433 Christopher Reed PPS20-0436 Karen L Rice PPS20-0437 Cheryl Richey PPS20-0440 David M Roberts PPS20-0206	Michael Noble	PPS20-0093
Dennis Norris PPS20-0411 Kody Norris PPS20-0412 Trinity Olson PPS20-0413 Craig Palmer PPS20-0414 Cynthia Paris PPS20-0415 Douglas W Patterson PPS20-0416 Antonio Perez PPS20-0417 Jaron Perkins PPS20-0417 Anha Pham PPS20-0419 Thai Pham PPS20-0420 Bonnie Phillippi PPS20-0420 Bonnie Phillippi PPS20-0597 Gregory Piazza PPS20-0421 Vincent A Piazza PPS20-0422 Brian T Pierce PPS20-0423 Timothy Pinney PPS20-0424 Joshua Pitts PPS20-0425 Craig Podgurski PPS20-0426 Nancy A Porter PPS20-0427 Andre Powell PPS20-0428 Benjamin Purses PPS20-0428 Benjamin Purses PPS20-0430 Charles Reardon PPS20-0431 Derek L Reddick PPS20-0432 Angela Reed PPS20-0434 Edward Reed PPS20-0436	Michael C Nolon	PPS20-0409
Kody Norris Trinity Olson PPS20-0412 Trinity Olson PPS20-0413 Craig Palmer PPS20-0415 Douglas W Patterson Antonio Perez PPS20-0417 Jaron Perkins PPS20-0418 Anha Pham PPS20-0419 Thai Pham PPS20-0420 Bonnie Phillippi PPS20-0421 Vincent A Piazza PPS20-0421 Vincent A Piazza PPS20-0423 Timothy Pinney PPS20-0425 Craig Podgurski PPS20-0425 Craig Podgurski Rocellious Pope PPS20-0426 Nancy A Porter Andre Powell PPS20-0427 Andre Powell PPS20-0428 Benjamin Purses PPS20-0429 Richard Ramirez PPS20-0430 Charles Reardon PPS20-0431 Derek L Reddick PPS20-0431 Derek L Reddick PPS20-0431 Christopher Reed PPS20-0434 Edward Reed PPS20-0435 Betty G Rice PPS20-0437 Cheryl Richey PPS20-0440 Debra Rios PPS20-0440 PPS20-0440 PPS20-0440 PPS20-0440 PPS20-0440 PPS20-0440	Colter Norris	
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Craig Palmer Cynthia Paris Douglas W Patterson Antonio Perez PPS20-0417 Jaron Perkins PPS20-0418 Anha Pham PPS20-0419 Thai Pham PPS20-0420 Bonnie Phillippi PPS20-0421 Vincent A Piazza PPS20-0423 Timothy Pinney PPS20-0425 Craig Podgurski Rocellious Pope Nancy A Porter Andre Powell PPS20-0427 Andre Powell PPS20-0428 Benjamin Purses Richard Ramirez Charles Reardon Derek L Reddick Angela Reed PPS20-0433 Christopher Reed PPS20-0436 Karen L Rice PPS20-0440 Debra Rios PPS20-0440 PPS20-0466	Kody Norris	PPS20-0412
Cynthia Paris Douglas W Patterson Antonio Perez PPS20-0416 Antonio Perez PPS20-0417 Jaron Perkins PPS20-0418 Anha Pham PPS20-0420 Bonnie Phillippi PPS20-0421 Vincent A Piazza PPS20-0422 Brian T Pierce PPS20-0423 Timothy Pinney PPS20-0424 Joshua Pitts PPS20-0425 Craig Podgurski Rocellious Pope PPS20-0426 Nancy A Porter Andre Powell PPS20-0428 Benjamin Purses Richard Ramirez PPS20-0429 Richard Ramirez PPS20-0430 Charles Reardon PPS20-0431 Derek L Reddick PPS20-0431 Derek L Reddick PPS20-0432 Angela Reed PPS20-0433 Christopher Reed PPS20-0435 Betty G Rice PPS20-0437 Cheryl Richey PPS20-0440 PPS20-0440 PPS20-0440 PPS20-0440 PPS20-04016	Trinity Olson	PPS20-0413
Douglas W Patterson Antonio Perez PPS20-0417 Jaron Perkins PPS20-0418 Anha Pham PPS20-0419 Thai Pham PPS20-0420 Bonnie Phillippi Gregory Piazza Vincent A Piazza PPS20-0421 Vincent A Piazza PPS20-0422 Brian T Pierce PPS20-0423 Timothy Pinney PPS20-0424 Joshua Pitts PPS20-0425 Craig Podgurski PPS20-0426 Nancy A Porter Andre Powell PPS20-0427 Andre Powell PPS20-0428 Benjamin Purses PPS20-0429 Richard Ramirez PPS20-0430 Charles Reardon PPS20-0431 Derek L Reddick PPS20-0431 Derek L Reddick PPS20-0432 Angela Reed PPS20-0433 Christopher Reed PPS20-0436 Edward Reed PPS20-0437 Cheryl Richey PPS20-0439 Terri Richards PPS20-0440 Debra Rios PPS20-0206	Craig Palmer	PPS20-0414
Antonio Perez Jaron Perkins PPS20-0418 Anha Pham PPS20-0419 Thai Pham PPS20-0420 Bonnie Phillippi PPS20-0421 Vincent A Piazza PPS20-0423 Brian T Pierce PPS20-0423 Timothy Pinney Joshua Pitts PPS20-0425 Craig Podgurski Rocellious Pope Nancy A Porter Andre Powell PPS20-0428 Benjamin Purses Richard Ramirez PPS20-0429 Richard Read PPS20-0431 Derek L Reddick Angela Reed PPS20-0432 Christopher Reed PPS20-0433 Edward Reed PPS20-0436 Karen L Rice PPS20-0439 Terri Richards PPS20-0440 Debra Rios PPS20-0440 PPS20-0440 PPS20-0440 PPS20-0440 PPS20-0440 PPS20-0440 PPS20-0440	Cynthia Paris	PPS20-0415
Jaron Perkins Anha Pham PPS20-0419 Thai Pham PPS20-0420 Bonnie Phillippi PPS20-0597 Gregory Piazza PPS20-0421 Vincent A Piazza PPS20-0422 Brian T Pierce PPS20-0423 Timothy Pinney PPS20-0424 Joshua Pitts PPS20-0425 Craig Podgurski PPS20-0425 Craig Podgurski PPS20-0426 Nancy A Porter Andre Powell PPS20-0427 Andre Powell PPS20-0428 Benjamin Purses PPS20-0429 Richard Ramirez PPS20-0430 Charles Reardon PPS20-0431 Derek L Reddick PPS20-0431 Derek L Reddick PPS20-0432 Angela Reed PPS20-0433 Christopher Reed PPS20-0435 Betty G Rice PPS20-0436 Karen L Rice PPS20-0439 Terri Richards PPS20-0440 Debra Rios PPS20-0206	Douglas W Patterson	PPS20-0416
Anha Pham PPS20-0419 Thai Pham PPS20-0420 Bonnie Phillippi PPS20-0597 Gregory Piazza PPS20-0421 Vincent A Piazza PPS20-0422 Brian T Pierce PPS20-0423 Timothy Pinney PPS20-0424 Joshua Pitts PPS20-0425 Craig Podgurski PPS20-0426 Nancy A Porter PPS20-0426 Nancy A Porter PPS20-0427 Andre Powell PPS20-0428 Benjamin Purses PPS20-0429 Richard Ramirez PPS20-0430 Charles Reardon PPS20-0431 Derek L Reddick PPS20-0431 Derek L Reddick PPS20-0432 Angela Reed PPS20-0433 Christopher Reed PPS20-0436 Edward Reed PPS20-0436 Karen L Rice PPS20-0439 Terri Richards PPS20-0440 Debra Rios PPS20-0406	Antonio Perez	
Thai Pham Bonnie Phillippi PPS20-0420 Brian T Pierce PPS20-0423 Timothy Pinney Joshua Pitts PPS20-0425 Rocellious Pope Nancy A Porter Andre Powell Benjamin Purses Richard Ramirez Charles Reardon Derek L Reddick Angela Reed PPS20-0430 Christopher Reed Edward Reed PPS20-0436 Karen L Rice PPS20-0430 PPS20-0430 Cheryl Richey PPS20-0430 Cheryl Richey PPS20-0430 Cheryl Richey PPS20-0430 PPS20-0431 PPS20-0431 PPS20-0432 PPS20-0432 PPS20-0433 Christopher Reed PPS20-0434 Edward Reed PPS20-0435 PPS20-0436 Karen L Rice PPS20-0439 PPS20-0430 PPS20-0439 PPS20-0440 PPS20-0440 PPS20-0440 PPS20-0440 PPS20-0406	Jaron Perkins	PPS20-0418
Bonnie Phillippi Gregory Piazza Vincent A Piazza PPS20-0421 Vincent A Piazza Brian T Pierce PPS20-0423 Timothy Pinney PPS20-0424 Joshua Pitts PPS20-0425 Craig Podgurski PPS20-0598 Rocellious Pope PPS20-0426 Nancy A Porter Andre Powell PPS20-0427 Andre Powell PPS20-0428 Benjamin Purses PPS20-0429 Richard Ramirez PPS20-0430 Charles Reardon PPS20-0431 Derek L Reddick PPS20-0431 Derek L Reddick PPS20-0432 Angela Reed PPS20-0433 Christopher Reed PPS20-0434 Edward Reed PPS20-0435 Betty G Rice PPS20-0437 Cheryl Richey PPS20-0439 Terri Richards PPS20-0440 Debra Rios PPS20-0206		PPS20-0419
Gregory Piazza Vincent A Piazza Brian T Pierce Prs20-0422 Brian T Pierce Prs20-0424 Joshua Pitts Prs20-0425 Craig Podgurski Rocellious Pope Nancy A Porter Andre Powell Prs20-0427 Andre Powell Prs20-0428 Benjamin Purses Richard Ramirez Prs20-0429 Richard Readick Prs20-0430 Charles Reardon Prs20-0431 Derek L Reddick Prs20-0432 Angela Reed Prs20-0433 Christopher Reed Prs20-0434 Edward Reed Prs20-0435 Betty G Rice Prs20-0436 Karen L Rice Prs20-0439 Terri Richards Prs20-0440 Debra Rios Prs20-0206	Thai Pham	PPS20-0420
Vincent A Piazza PPS20-0422 Brian T Pierce PPS20-0423 Timothy Pinney PPS20-0424 Joshua Pitts PPS20-0425 Craig Podgurski PPS20-0598 Rocellious Pope PPS20-0426 Nancy A Porter PPS20-0427 Andre Powell PPS20-0428 Benjamin Purses PPS20-0429 Richard Ramirez PPS20-0430 Charles Reardon PPS20-0431 Derek L Reddick PPS20-0431 Angela Reed PPS20-0432 Angela Reed PPS20-0433 Christopher Reed PPS20-0436 Edward Reed PPS20-0436 Karen L Rice PPS20-0439 Terri Richards PPS20-0440 Debra Rios PPS20-0206	Bonnie Phillippi	PPS20-0597
Brian T Pierce PPS20-0423 Timothy Pinney PPS20-0424 Joshua Pitts PPS20-0425 Craig Podgurski PPS20-0598 Rocellious Pope PPS20-0426 Nancy A Porter PPS20-0427 Andre Powell PPS20-0428 Benjamin Purses PPS20-0429 Richard Ramirez PPS20-0430 Charles Reardon PPS20-0431 Derek L Reddick PPS20-0431 Derek L Reddick PPS20-0432 Angela Reed PPS20-0433 Christopher Reed PPS20-0434 Edward Reed PPS20-0435 Betty G Rice PPS20-0436 Karen L Rice PPS20-0439 Terri Richards PPS20-0440 Debra Rios PPS20-0206	Gregory Piazza	PPS20-0421
Timothy Pinney PPS20-0424 Joshua Pitts PPS20-0425 Craig Podgurski PPS20-0598 Rocellious Pope PPS20-0426 Nancy A Porter PPS20-0427 Andre Powell PPS20-0428 Benjamin Purses PPS20-0429 Richard Ramirez PPS20-0430 Charles Reardon PPS20-0431 Derek L Reddick PPS20-0432 Angela Reed PPS20-0433 Christopher Reed PPS20-0434 Edward Reed PPS20-0435 Betty G Rice PPS20-0436 Karen L Rice PPS20-0439 Terri Richards PPS20-0106 Debra Rios PPS20-0206	Vincent A Piazza	PPS20-0422
Joshua Pitts PPS20-0425 Craig Podgurski PPS20-0598 Rocellious Pope PPS20-0426 Nancy A Porter PPS20-0427 Andre Powell PPS20-0428 Benjamin Purses PPS20-0429 Richard Ramirez PPS20-0430 Charles Reardon PPS20-0431 Derek L Reddick PPS20-0432 Angela Reed PPS20-0433 Christopher Reed PPS20-0434 Edward Reed PPS20-0436 Betty G Rice PPS20-0437 Cheryl Richey PPS20-0439 Terri Richards PPS20-0106 Debra Rios PPS20-0206	Brian T Pierce	PPS20-0423
Craig Podgurski PPS20-0598 Rocellious Pope PPS20-0426 Nancy A Porter PPS20-0427 Andre Powell PPS20-0428 Benjamin Purses PPS20-0429 Richard Ramirez PPS20-0430 Charles Reardon PPS20-0431 Derek L Reddick PPS20-0432 Angela Reed PPS20-0433 Christopher Reed PPS20-0434 Edward Reed PPS20-0435 Betty G Rice PPS20-0436 Karen L Rice PPS20-0437 Cheryl Richey PPS20-0439 Terri Richards PPS20-0106 Debra Rios PPS20-0206	Timothy Pinney	PPS20-0424
Rocellious Pope PPS20-0426 Nancy A Porter PPS20-0427 Andre Powell PPS20-0428 Benjamin Purses PPS20-0429 Richard Ramirez PPS20-0430 Charles Reardon PPS20-0431 Derek L Reddick PPS20-0432 Angela Reed PPS20-0433 Christopher Reed PPS20-0434 Edward Reed PPS20-0435 Betty G Rice PPS20-0436 Karen L Rice PPS20-0437 Cheryl Richey PPS20-0439 Terri Richards PPS20-0106 Debra Rios PPS20-0440 David M Roberts PPS20-0206	Joshua Pitts	PPS20-0425
Nancy A Porter PPS20-0427 Andre Powell PPS20-0428 Benjamin Purses PPS20-0429 Richard Ramirez PPS20-0430 Charles Reardon PPS20-0431 Derek L Reddick PPS20-0432 Angela Reed PPS20-0433 Christopher Reed PPS20-0434 Edward Reed PPS20-0435 Betty G Rice PPS20-0436 Karen L Rice PPS20-0437 Cheryl Richey PPS20-0439 Terri Richards PPS20-0106 Debra Rios PPS20-0440 David M Roberts PPS20-0206	Craig Podgurski	PPS20-0598
Andre Powell PPS20-0428 Benjamin Purses PPS20-0429 Richard Ramirez PPS20-0430 Charles Reardon PPS20-0431 Derek L Reddick PPS20-0432 Angela Reed PPS20-0433 Christopher Reed PPS20-0434 Edward Reed PPS20-0435 Betty G Rice PPS20-0436 Karen L Rice PPS20-0437 Cheryl Richey PPS20-0439 Terri Richards PPS20-0106 Debra Rios PPS20-0440 David M Roberts PPS20-0206	Rocellious Pope	PPS20-0426
Benjamin Purses PPS20-0429 Richard Ramirez PPS20-0430 Charles Reardon PPS20-0431 Derek L Reddick PPS20-0432 Angela Reed PPS20-0433 Christopher Reed PPS20-0434 Edward Reed PPS20-0435 Betty G Rice PPS20-0436 Karen L Rice PPS20-0437 Cheryl Richey PPS20-0439 Terri Richards PPS20-0106 Debra Rios PPS20-0440 David M Roberts PPS20-0206	Nancy A Porter	PPS20-0427
Richard Ramirez Charles Reardon Derek L Reddick Angela Reed Christopher Reed Edward Reed PPS20-0434 Edward Reed PPS20-0435 Betty G Rice FPS20-0436 Karen L Rice PPS20-0437 Cheryl Richey PPS20-0439 Terri Richards PPS20-0440 David M Roberts PPS20-0206	Andre Powell	PPS20-0428
Charles Reardon Derek L Reddick Angela Reed PPS20-0432 PPS20-0433 Christopher Reed PPS20-0434 Edward Reed PPS20-0435 Betty G Rice PPS20-0436 Karen L Rice PPS20-0437 Cheryl Richey PPS20-0439 Terri Richards PPS20-0106 Debra Rios PPS20-0206	Benjamin Purses	PPS20-0429
Derek L Reddick PPS20-0432 Angela Reed PPS20-0433 Christopher Reed PPS20-0434 Edward Reed PPS20-0435 Betty G Rice PPS20-0436 Karen L Rice PPS20-0437 Cheryl Richey PPS20-0439 Terri Richards PPS20-0106 Debra Rios PPS20-0440 David M Roberts PPS20-0206	Richard Ramirez	
Angela Reed PPS20-0433 Christopher Reed PPS20-0434 Edward Reed PPS20-0435 Betty G Rice PPS20-0436 Karen L Rice PPS20-0437 Cheryl Richey PPS20-0439 Terri Richards PPS20-0106 Debra Rios PPS20-0440 David M Roberts PPS20-0206	Charles Reardon	PPS20-0431
Christopher Reed PPS20-0434 Edward Reed PPS20-0435 Betty G Rice PPS20-0436 Karen L Rice PPS20-0437 Cheryl Richey PPS20-0439 Terri Richards PPS20-0106 Debra Rios PPS20-0440 David M Roberts PPS20-0206	Derek L Reddick	PPS20-0432
Edward Reed PPS20-0435 Betty G Rice PPS20-0436 Karen L Rice PPS20-0437 Cheryl Richey PPS20-0439 Terri Richards PPS20-0106 Debra Rios PPS20-0440 David M Roberts PPS20-0206	Angela Reed	PPS20-0433
Betty G Rice PPS20-0436 Karen L Rice PPS20-0437 Cheryl Richey PPS20-0439 Terri Richards PPS20-0106 Debra Rios PPS20-0440 David M Roberts PPS20-0206	Christopher Reed	PPS20-0434
Karen L Rice PPS20-0437 Cheryl Richey PPS20-0439 Terri Richards PPS20-0106 Debra Rios PPS20-0440 David M Roberts PPS20-0206	Edward Reed	PPS20-0435
Karen L Rice PPS20-0437 Cheryl Richey PPS20-0439 Terri Richards PPS20-0106 Debra Rios PPS20-0440 David M Roberts PPS20-0206	Betty G Rice	PPS20-0436
Terri Richards PPS20-0106 Debra Rios PPS20-0440 David M Roberts PPS20-0206		PPS20-0437
Debra Rios PPS20-0440 David M Roberts PPS20-0206	Cheryl Richey	PPS20-0439
David M Roberts PPS20-0206	Terri Richards	
	Debra Rios	PPS20-0440
Patricia Roberts PPS20-0207	David M Roberts	PPS20-0206
	Patricia Roberts	PPS20-0207

Jeroy Robinson	PPS20-0441
Sammie Robinson	PPS20-0108
Adrienne Rodriguez	PPS20-0442
Gabriel Rodriguez	PPS20-0443
Mateo F Rodriguez	PPS20-0444
Richard C Ross	PPS20-0445
Melissa Ruiz	PPS20-0446
Antonio Ruque	PPS20-0447
Geena Christine Rupp	PPS20-0599
Edna Russell	PPS20-0110
Lee H Russell	PPS20-0448
Mark A Russell	PPS20-0449
John Sadler	PPS20-0450
Ligno Sanchez	PPS20-0451
Virginia Saxon-Ford	PPS20-0452
Greg Schermerhorn	PPS20-0453
Brenda Schiwitz	PPS20-0111
Michael Schuller	PPS20-0454
Nathaniel Scott	PPS20-0455
Grant Selvey	PPS20-0600
Quratulain Shoukat	PPS20-0456
Jeremy Small	PPS20-0457
Monica Smith	PPS20-0458
Anthony Spada	PPS20-0459
Melissa Spencer	PPS20-0460
Jamie Stallo	PPS20-0461
Marc A Starks	PPS20-0462
Barbara Steil	PPS20-0463
Kelvin Stinyard	PPS20-0464
Randy Stone	PPS20-0117
Sonja Stone	PPS20-0118
Steven Stosur	PPS20-0465
Robert T Stover	PPS20-0006
Jeanie Straessler	PPS20-0466
Chance Strawser	PPS20-0467
David Taliaferro	PPS20-0119
Ramona Rose	FF 320-0119
Talvacchio	PPS20-0468
Katherina M Tan	PPS20-0469
Berhane Tassaw	PPS20-0409
Michael Taylor	PPS20-0470
Courtney S. Thiemann	PPS20-0120
-	PPS20-0602
Robert Hayes Thomas	rr320-0002

Walter Thomas	PPS20-0603
William Wyatt Thomas	PPS20-0604
Christina Tiffany	PPS20-0471
Stephen M Troutz	PPS20-0472
Clinton Turpen	PPS20-0473
Henry J Valladares Cruz	PPS20-0474
Margarita Vasquez	PPS20-0475
Robert E Vick, II	PPS20-0476
Bradley Votaw	PPS20-0477
Joseph T Wachowski	PPS20-0478
Ambiko Wallace	PPS20-0479
Vance M Warren, Sr.	PPS20-0480
Barbara West	PPS20-0481
Pamela K Wheetley	PPS20-0007
Jennifer White	PPS20-0482
Gregory Willing	PPS20-0130
Conni Wilson	PPS20-0131
Deborah A Wilson	PPS20-0484
Jerry Wilson	PPS20-0132
Mitchell Wirth	PPS20-0485
Debra Woodhouse	PPS20-0133
Jerry Wooten	PPS20-0487
Kimary Ann Zappia	PPS20-0606

as private process servers in the above-captioned matter. In support of said motion, Plaintiff states that the above-named individuals are on the Court's list of approved process servers and the information contained in their applications and affidavits on file is current and still correct.

Dated: September 24, 2020 Respectfully Submitted,

HUMPHREY, FARRINGTON & McCLAIN, P.C.

/s/ Andrew K. Smith

Kenneth B. McClain MO Bar #32430 Andrew K. Smith MO Bar #60485 Lauren McClain MO Bar #65016 Timothy Kingsbury MO Bar #64958

221W. Lexington, Suite 400 Independence, MO 64050 Telephone: (816) 836-5050 Facsimile: (816) 836-8966

kbm@hfmlegal.com aks@hfmlegal.com lem@hfmlegal.com tik@hfmlegal.com

Attorneys for Plaintiffs

ORDER FOR APPOINTMENT OF PRIVATE PROCESS SERVER

It is hereby ordered that Plaintiff's Motion for A	Appointment of Private Process Server is
sustained and the above named individuals are hereby	appointed to serve process in the above
captioned matter.	
DATE:	
	Judge or Circuit Clerk

7					
Judge or Division:		Case Number: 2022-CC09988			
REX M BURLISON					
Plaintiff/Petitioner:		Plaintiff's/Petitioner's Attorney/Ac	ldress		
TINA POYNTER-ABELL		ANDREW KELLEY SMITH			
,		SUITE 400			
		221 W LEXINGTON			
	vs.	INDEPENDENCE, MO 64051			
Defendant/Respondent:		Court Address:			
3M COMPANY		CIVIL COURTS BUILDING			
		10 N TUCKER BLVD			
Nature of Suit:		SAINT LOUIS, MO 63101		(Date File Stamp)	
CC Wrongful Death	Sur	nmons in Civil Case		(Date File Otamp)	
The State of Missouri to					
	Alias:				
CT CORPORATION SYSTEM, F					
120 SOUTH CENTRAL AVENU	E		STLOUIS	COUNTY SHERIF	F
CLAYTON, MO 63105				and the second s	1
COURT SEAL OF	copy of which is at plaintiff/petitioner a exclusive of the date be taken against ye	d to appear before this court and tached, and to serve a copy of y at the above address all within 3 by of service. If you fail to file you for the relief demanded in the	your pleading 30 days after r ur pleading, ju e petition.	upon the attorney for eceiving this summo udgment by default m	r ns,
CITY OF ST LOUIS	September 28,	2020	Lonar Kloy	ngunger	
	Date		Clerk		
	Further Information:				
I certify that I have served delivering a copy of the s	Summons should be retu d the above summons by: e summons and a copy o summons and a copy of the	f the petition to the defendant/respond ne petition at the dwelling place or usu , a person of the defer fendant/respondent. of the summons and a copy of the cor	dent. al abode of the ondant's/responde	defendant/respondent wit ent's family over the age o	O1
		(name)		(title)	1-
☐ other:					
Served at				(address	;)
		ty of St. Louis), MO, on			
in	(County/Ci	ty of St. Louis), WO, off	(GG	.0) ut	.,.
Printed Name	e of Sheriff or Server		Signature of Sh	eriff or Server	
		otary public if not served by an authoria		(data)	
	Subscribed and sworn to	before me on		(date).	
(Seal)					
	My commission expires:	Date	Not	ary Public	_
·		Date			
Sheriff's Fees, if applicab	^				
Summons	\$				
Non Est	\$				
Sheriff's Deputy Salary					
Supplemental Surcharge	\$ 10.00				
Mileage	\$(_	miles @ \$ per mile)			
Total	\$				
A copy of the summons an	d a copy of the petition m	ust be served on each defendant/resp	oondent. For met	hods of service on all	
classes of suits, see Supre	me Court Rule 54.				



THE STATE OF THE S					
Judge or Division:		Case Number: 2022-CC09988			
REX M BURLISON					
Plaintiff/Petitioner:		Plaintiff's/Petitioner's Attorney/Ad	dress		
TINA POYNTER-ABELL		ANDREW KELLEY SMITH			
		SUITE 400			
		221 W LEXINGTON			
	VS.	INDEPENDENCE, MO 64051			
Defendant/Respondent:		Court Address:			
3M COMPANY		CIVIL COURTS BUILDING 10 N TUCKER BLVD			
Nature of Suit:		SAINT LOUIS, MO 63101			
CC Wrongful Death				(Date F	ile Stamp)
		mmons in Civil Case			
The State of Missouri to	: EIDUPONT DE NE	MOURS INC			
C T CODDODATION SYSTEM	Alias: FKA DOWDU	IPONT INC, DOWPUPONT			
C T CORPORATION SYSTEM 120 SOUTH CENTRAL AVE CLAYTON, MO 63105			ST LOUIS	COUNTY	SHERIFF
			and the same of th		variantinis viikinis variantinis variantinis variantinis variantinis variantinis variantinis variantinis varian
COURT SEAL OF	You are summone	d to appear before this court and	to file your pl	eading to t	the petition, a
	copy of which is at	tached, and to serve a copy of y	our pleading t	ipon the at	torney for
	plaintim/petitioner	at the above address all within 3 by of service. If you fail to file yo	ur pleading in	dament hy	default may
(SI(X)(SI)(SI)	be taken against v	ou for the relief demanded in the	n pieaung, ju e netition.	agillolle by	aciaali may
	De taken agamst y			•	
CITY OF ST LOUIS	September 28,	2020	Romas Kloey	gruger	
	Date		Clerk		
	Further Information:				
-		neriff's or Server's Return			
		rned to the court within 30 days after t	ne date of issue.		
I certify that I have served	d the above summons by:	(check one)			
☐ delivering a copy of th	e summons and a copy o summons and a copy of the	f the petition to the defendant/respond ne petition at the dwelling place or usu , a person of the defen	al abode of the de	efendant/resp	oondent with
45	nently resides with the de	, a person of the deter	idani shesponder	it's fairling ove	er the age of
for service on a corpo	oration) delivering a copy	of the summons and a copy of the con	nplaint to:		
			•		(title).
other:					
Served at					_ (address)
		ty of St. Louis), MO, on	(date	e) at	(time).
in	(Oddity/O	ty of ot. Louis), ino, on			
Printed Nam	e of Sheriff or Server	atan, nublic if not conved by an authoriz	Signature of She	riff or Server	
		otary public if not served by an authoriz		(date).	
(Seal)	Subscribed and sworn to	before me on		uaic).	
(Ocal)	My commission expires:				
		Date	Nota	ry Public	
Sheriff's Fees, if applicab	le				
Summons	\$				
Non Est	\$				
Sheriff's Deputy Salary	e 40.00				
Supplemental Surcharge	\$(miles @ \$ per mile)			
Mileage		nilles @ a per mile)			
Total	\$	ust be conved on anch defendant/reen	ondent Formeth	nds of servic	e on all
A copy of the summons an	a a copy of the petition m	ust be served on each defendant/resp	onacht. I di meti	OUS OF SCIVIC	o on an

classes of suits, see Supreme Court Rule 54.



		,			
Judge or Division:		Case Number: 2022-CC09988			
REX M BURLISON Plaintiff/Petitioner:		Plaintiff's/Petitioner's Attorney/Ad	dress		
TINA POYNTER-ABELL		ANDREW KELLEY SMITH SUITE 400	-		
	VS.	221 W LEXINGTON INDEPENDENCE, MO 64051			
Defendant/Respondent: 3M COMPANY		Court Address: CIVIL COURTS BUILDING			
Nature of Suit: CC Wrongful Death		10 N TUCKER BLVD SAINT LOUIS, MO 63101		(Date File	Stamp)
	Sur	nmons in Civil Case			
The State of Missouri to:	LEO M. ELLEBRAC	HT COMPANY BRACHT FIRE APPARATUS SER	VICE INC		
LLOYD A DEWALD, RAGT 104 MULLACH CT SUITE 1028 WENTZVILLE, MO 63385			SPECIALI	PROCESS	- 20 a delegal este al la constitución de la consti
COURT SEAL OF	copy of which is at plaintiff/petitioner a exclusive of the da	d to appear before this court and tached, and to serve a copy of y at the above address all within 3 by of service. If you fail to file you for the relief demanded in the	our pleading to days after re ur pleading, jude petition.	ipon the atto ceiving this s dgment by de	rney tor summons,
CITY OF ST LOUIS	September 28,	2020 7.	Romas Kloep	yringer_	
	Date		Clerk		
	Further Information:	neriff's or Server's Return			
I certify that I have served	the above summons by:	rned to the court within 30 days after the (check one) f the petition to the defendant/responding place or usually, a person of the defen	ent. al abode of the de	efendant/respor it's family over	ndent with
15 years who perman (for service on a corpor	ently resides with the de ration) delivering a copy	fendant/respondent. of the summons and a copy of the com(name)			(title).
☐ other:					·
in	(County/Cit	y of St. Louis), MO, on	(date	e) at	(time).
Printed Name	of Sheriff or Server	otary public if not served by an authorize	Signature of She	riff or Server	
		before me on		(date).	
(Seal)	My commission expires:	Date	Nota	y Public	
Sheriff's Fees, if applicable	• • • • • • • • • • • • • • • • • • •			-	
Summons Non Est	Ψ \$				

\$ \$

classes of suits, see Supreme Court Rule 54.

10.00

Sheriff's Deputy Salary Supplemental Surcharge

Mileage

Total

miles @ \$.____ per mile)

A copy of the summons and a copy of the petition must be served on each defendant/respondent. For methods of service on all



2:21-cv-00365-F IN THE 22ND		JIT, CITY OF ST LOUIS, MIS		ge 49 of 103
Judge or Division:		Case Number: 2022-CC09988		
REX M BURLISON				
Plaintiff/Petitioner:		Plaintiff's/Petitioner's Attorney/Ad	dress	
TINA POYNTER-ABELL		ANDREW KELLEY SMITH		_
77777 3 7777 3 777		SUITE 400		
		221 W LEXINGTON		
	VS.	INDEPENDENCE, MO 64051		
Defendant/Respondent:		Court Address:		
3M COMPANY		CIVIL COURTS BUILDING		
Nature of Suit:		10 N TUCKER BLVD		
CC Wrongful Death		SAINT LOUIS, MO 63101		(Date File Stamp)
		nmons in Civil Case		
The State of Missouri to:	RAYTHEON TECHN	OLOGIES CORPORATION		
		D TECHNOLOGIES CORPORAT	ION	
CT CORPORATION SYSTEM, RAC 120 SOUTH CENTRAL AVE CLAYTON, MO 63105	3 T		ST LOUIS	COUNTY SHERIFF
·		_	any in a management of the control o	inaminaning pagamananan mananan manana
COURT SEAL OF	You are summone	d to appear before this court and	to file your p	pleading to the petition, a
	plaintiff/petitioner exclusive of the da	ttached, and to serve a copy of y at the above address all within 3 by of service. If you fail to file you ou for the relief demanded in the	0 days after r ur pleading, ju petition.	eceiving this summons, udgment by default may
CITY OF ST LOUIS	September 28,	2020	Romas Kloe	ngunger
	Date		Clerk	
	Further Information:			
I certify that I have served the delivering a copy of the selection leaving a copy of the sun 15 years who permaner	mmons should be reture above summons by: summons and a copy of the above summons and a copy of the above summons and a copy of the above summons accept the accept the above summons accept the above summons accept the above summons accept the accep	f the petition to the defendant/respond ne petition at the dwelling place or usua , a person of the defen fendant/respondent. of the summons and a copy of the con	ent. al abode of the o dant's/responde	defendant/respondent with ent's family over the age of
		(name)		(title).
other:				·
Served at				(address)



7.55				-	
Judge or Division:		Case Number: 2022-CC0998	38		
REX M BURLISON					·
Plaintiff/Petitioner:		Plaintiff's/Petitioner's Attorney	/Address		
TINA POYNTER-ABELL		ANDREW KELLEY SMITH			
TINAT OTNIER-ABELE		SUITE 400			
		221 W LEXINGTON			
	VS.	INDEPENDENCE, MO 64051			
Defendant/Respondent:		Court Address:	•		
3M COMPANY		CIVIL COURTS BUILDING			
Nature of Suit:		10 N TUCKER BLVD			
CC Wrongful Death		SAINT LOUIS, MO 63101		(Date File	e Stamp)
		nmons in Civil Case			· · · · · · · · · · · · · · · · · · ·
The State of Missouri to		ENCY SOLUTIONS, LLC			
CHARLES A HUBTH III BACT	Alias:				
CHARLES A HURTH, III, RAGT 301 E MAIN ST			SDECIAL	PROCESS	SERVER
UNION, MO 63084			SPECIAL	PROCESS	SCIVER
0000000000000		l to annual before this court	and to file your	oleading to th	e netition a
COURT SEAL OF	You are summoned	l to appear before this court tached, and to serve a copy (and to me your p	upon the atto	e pelition, a
	copy of which is at	at the above address all with	in 30 days after r	eceiving this	summons.
(3)	ovelucive of the da	y of service. If you fail to file	vour pleading, i	udament by d	efault may
(SI (X) (SI) (SI)	he taken against vo	ou for the relief demanded in	the petition.	g,	•
	De taken agamst y			•	
CITY OF ST LOUIS	September 28,	2020	Thomas Kloc	pyringer	
CITTOT ST ESSIE	Date		Clerk	·	
			Cioni		
	Further Information:	eriff's or Server's Return			
Note to coming officer		ned to the court within 30 days aft	er the date of issue		
Note to serving officer.	d the above summons by:	(check one)	• • • • • • • • • • • • • • • • • • • •		
The deliversian a compact the	u the above summons by.	f the petition to the defendant/resp	ondent.		
leaving a copy of the	summons and a copy of the	e netition at the dwelling place of i	usual abode of the l	defendant/respo	ndent with
		, a person of the de	efendant's/responde	ent's family over	the age of
15 years who perma	nently resides with the de	fendant/respondent.			
(for service on a corp	oration) delivering a copy	of the summons and a copy of the	complaint to:		(title).
		(name)			(uue).
other:				<u> </u>	 ·
Served at					(address)
		y of St. Louis), MO, on		ite) at	(time).
ın	(Oddity/Of	y 01 0t. 20010); Mo; 011		,	
Printed Nam	e of Sheriff or Server		Signature of Sh	eriff or Server	
		otary public if not served by an auth			
	Subscribed and sworn to	before me on	·	_ (date).	
(Seal)					
	My commission expires:	Date	Not	tary Public	
Ob a Mar Francis of applicable					
Sheriff's Fees, if applicate Summons	ле \$				
Non Est	\$				
Sheriff's Deputy Salary	¥				
Supplemental Surcharge	\$ 10.00				
Mileage		miles @ \$ per mile)	l		
Total	\$				
A copy of the summons ar	nd a copy of the petition m	ust be served on each defendant/r	espondent. For me	thods of service	on all
classes of suits, see Supre	eme Court Rule 54.				



2:21-cv-00365-RMG Date Filed 11/02/20 Entry Number 1-1 Page 51 of 103 IN THE 22ND JUDICIAL CIRCUIT, CITY OF ST LOUIS, MISSOURI

Judge or Division: REX M BURLISON		Case Number: 2022-CC09988		
		Digintiffic/Detitioner's Atterney/Ad	dross	
Plaintiff/Petitioner:		Plaintiff's/Petitioner's Attorney/Ad- ANDREW KELLEY SMITH	uress	
TINA POYNTER-ABELL		•		
		SUITE 400	İ	
		221 W LEXINGTON		
		INDEPENDENCE, MO 64051		
Defendant/Respondent:		Court Address:		
3M COMPANY	i	CIVIL COURTS BUILDING		
		10 N TUCKER BLVD		
Nature of Suit:		SAINT LOUIS, MO 63101	(D)	ate File Stamp)
CC Wrongful Death	Sui	nmons in Civil Case	(Da	ate File Starip)
T1 - 04-4 6 BBi 4-				
The State of Missouri to		OWIPANT FC, LLC		
	Alias:			
CT CORPORATION SYSTEM,				TV OUEDIEE
120 SOUTH CENTRAL AVENU CLAYTON, MO 63105) <u>C</u>		ST LOUIS COUN	IYSHERIFF
CEATION, MC 03100			at the first of the control of the c	
COURT SEAL OF	Vou are summone	d to appear before this court and	to file your pleading	to the petition, a
COOKT SEAL OF	convert which is st	tached, and to serve a copy of y	our pleading upon the	attorney for
	copy of which is a	at the above address all within 3	Odi picading apon ind	this summons
	plaintin/petitioner	at the above address all widilit s	ways alter receiving	by default may
(2(7)2)	exclusive of the da	y of service. If you fail to file you	ir pieading, judgineiti	by deladit illay
(S)(A)(S)	be taken against y	ou for the relief demanded in the		
The court of the c	0 1 100	-T	Romas Ploeppinge	
CITY OF ST LOUIS	September 28,	2020	mas Jorgyman	·
0,7, 0, 0, 200,0			Clerk	
	Date		Clerk	
	Further Information:			
	SI	neriff's or Server's Return		
Note to serving officer:	Summons should be retu	rned to the court within 30 days after th	ne date of issue.	
Logrify that I have serve	d the above summons by:	(check one)		
delivering a convert the	o summons and a conv o	f the petition to the defendant/respond	ent.	
Leaving a copy of the	cummons and a conv of the	ne petition at the dwelling place or usua	al abode of the defendant/	respondent with
leaving a copy of the	summons and a copy of a	a person of the defen	dant's/respondent's family	over the age of
15 years who perma	anently resides with the de	fendant/respondent.	•	
(for service on a corn	oration) delivering a copy	of the summons and a copy of the con	plaint to:	
(10) service on a corp.	cration, donvering a copy	(name)		(title).
other:				
Control of			_	(address)
Served at			(deta) et	(time).
in	(County/Ci	ty of St. Louis), MO, on	(date) at	(tille).
Printed Nam	ne of Sheriff or Server		Signature of Sheriff or Serv	rer
1 111100 140111	Must be sworn before a n	otary public if not served by an authorize	ed officer:	
		before me on		
(Seal)	Subscribed and sworm to	belefe me on		
(368)	My commission expires			
	my commission expires	Date	Notary Public	
Ol im resident	-1-			
Sheriff's Fees, if applicat	JIE e			
Summons	Φ			
Non Est	\$			
Sheriff's Deputy Salary				
Supplemental Surcharge	\$ 10.00			
Mileage				
		miles @ \$ per mile)		
Total	\$(_			
Total	\$(_	miles @ \$ per mile) ust be served on each defendant/resp	ondent. For methods of se	ervice on all



Judge or Division:		Case Number: 2022-CC09988			
REX M BURLISON					
Plaintiff/Petitioner:		Plaintiff's/Petitioner's Attorney/Ad	dress		
TINA POYNTER-ABELL		ANDREW KELLEY SMITH			
		SUITE 400			
		221 W LEXINGTON			
	VS.	INDEPENDENCE, MO 64051			
Defendant/Respondent:		Court Address:			
3M COMPANY		CIVIL COURTS BUILDING			
Nature of Suit:		10 N TUCKER BLVD			
CC Wrongful Death		SAINT LOUIS, MO 63101		(Date File	e Stamp)
		mmons in Civil Case			
The State of Missouri to					
	Alias: SUCC THE A	NSUL COMPANY	······································	**************************************	
CT CORPORATION SYSTEM, 120 SOUTH CENTRAL AVENU	RAGT F	***************************************	07101110	001111716	co.cc
CLAYTON, MO 63105	' L		STLOUIS	COUNTYS	HEKIFF
32 10, 00				***************************************	· · · · · · · · · · · · · · · · · · ·
COURT SEAL OF	You are summone	d to appear before this court and	l to file your pl	eading to th	e petition, a
COURTOR	copy of which is at	tached, and to serve a copy of y	our pleading u	ipon the atto	orney for
	plaintiff/petitioner	at the above address all within 3	0 days after re	ceiving this	summons,
(2(/1/2/2/1)2)	exclusive of the da	y of service. If you fail to file you	ır pleading, ju	agment by a	erauit may
(3)	be taken against y	ou for the relief demanded in the	petition.		
Sicces /	September 28,	2020	Romas Kloep	minuse.	
CITY OF ST LOUIS	September 20,	2020	7,	7 0	
	Date		Clerk		
	Further Information:				
	Si	neriff's or Server's Return			
Note to serving officer:	Summons should be retu	rned to the court within 30 days after th	ne date of issue.		
I certify that I have serve	d the above summons by:	(check one)			
delivering a copy of the	ne summons and a copy o	f the petition to the defendant/respond	ent. al abode of the de	afendant/resnc	ndent with
☐ leaving a copy of the	summons and a copy of the	ne petition at the dwelling place or usua a person of the defen	dant's/responder	it's family over	the age of
15 years who perma	nently resides with the de	fendant/respondent.		,	Ü
for service on a corp	oration) delivering a copy	of the summons and a copy of the com	nplaint to:		
		(name)			(title).
other:					·
Served at					(address)
in	(County/Ci	ty of St. Louis), MO, on	(date	e) at	(time).
ın	(Oddity/O	ty of ot. Louis, 1110, 511	<u> </u>		,
					
Printed Nam	e of Sheriff or Server	atom multiplie if not convod by an authoriz	Signature of She	riff or Server	
		otary public if not served by an authorize		(date)	
(01)	Subscribed and sworn to	before me on		date).	
(Seal)	My commission expires				
	Wy Commiscion expired	Date	Nota	ry Public	
Sheriff's Fees, if applicat	ole		•		
Summons	\$				
Non Est	\$				
Sheriff's Deputy Salary					
Supplemental Surcharge	\$ <u>10.00</u>				
Mileage	\$(_	miles @ \$ per mile)			
Total	\$!!
A copy of the summons ar	nd a copy of the petition m	ust be served on each defendant/resp	ondent. For meth	ods of service	on all
classes of suits, see Supre	eme Court Rule 54.	·			

Charles Andrews

-week.		
Judge or Division:	Case Number: 2022-CC09988	
REX M BURLISON		
Plaintiff/Petitioner:	Plaintiff's/Petitioner's Attorney/Address	
TINA POYNTER-ABELL	ANDREW KELLEY SMITH	
	SUITE 400	
	221 W LEXINGTON	
	vs. INDEPENDENCE, MO 64051	
Defendant/Respondent:	Court Address:	
3M COMPANY	CIVIL COURTS BUILDING	
Nature of Suit:	10 N TUCKER BLVD	
CC Wrongful Death	SAINT LOUIS, MO 63101	(Date File Stamp)

	VS.	INDEPENDENCE, MO 64051		
Defendant/Respondent:		Court Address:		
3M COMPANY		CIVIL COURTS BUILDING 10 N TUCKER BLVD		
Nature of Suit:		SAINT LOUIS, MO 63101	(Do	to Eilo Stamp)
CC Wrongful Death			(Da	te File Stamp)
		mmons in Civil Case	ATION INC	
The State of Missouri to		CURITY AMERICAS CORPOR	ATION INC	
CT CORPORATION SYSTEM,	Alias: RAGT			
120 SOUTH CENTRAL AVENU		·	ST LOUIS COUNT	TY SHERIFF
CLAYTON, MO 63105				
COURT SEAL OF	You are summone	d to appear before this court	and to file your pleading t	o the petition, a
COURTOR	copy of which is at	tached, and to serve a copy o	of your pleading upon the	attorney for
	plaintiff/petitioner	at the above address all withi	in 30 days after receiving a	tnis summons, by default may
(B)(X(1)(B))	exclusive of the da	ly of service. If you fail to file ou for the relief demanded in	the netition.	by delault illay
CITY OF ST LOUIS	September 28,	2020	Thomas Moeppinger	-
	Date		Clerk	
	Further Information:			
	Sh	neriff's or Server's Return		
		rned to the court within 30 days aft	er the date of issue.	
I certify that I have serve	d the above summons by:	(check one)	andont	
☐ delivering a copy of the	cummons and a convint th	f the petition to the defendant/response petition at the dwelling place or	usual abode of the defendant/r	espondent with
		, a person of the de	efendant's/respondent's family	over the age of
15 years who perma	nently resides with the de	fendant/respondent.	complaint to:	
(for service on a corp	oration) delivering a copy	of the summons and a copy of the (name)	complaint to:	(title).
other:		,		·
				(address)
Served at			(data) at	(add/css)
in	(County/Ci	ty of St. Louis), MO, on	(date) at	(unie).
Printed Nam	ne of Sheriff or Server		Signature of Sheriff or Serve	er
	Must be sworn before a n	otary public if not served by an auth		
(0	Subscribed and sworn to	before me on	(date).	
(Seal)	My commission expires:			
	Wy Commiscion expired	Date	Notary Public	
Sheriff's Fees, if applicat	ole			
Summons	\$			
Non Est	\$			
Sheriff's Deputy Salary Supplemental Surcharge	\$ 10.00			
Mileage		miles @ \$ per mile)		
Total	\$			
A copy of the summons ar	nd a copy of the petition m	ust be served on each defendant/r	espondent. For methods of se	rvice on all
classes of suits, see Supre	eme Court Rule 54.	<u> </u>		

AFFIDAVIT OF SERVICE

State of Missouri County of Sal	• • • • • • • • • • • • • • • • • • • •	
Case Number: 2022-CC09988		
Plaintiff/Petitioner: TINA POYNTER-ABELL, as Spouse of and on behalf of ABELL	Decedent ROBERT	
vs. Defendant/Respondent: 3M COMPANY, et al.		
Received by HPS Process Service & Investigations to be a LLC, 3500 South Dupont Highway, Dover, DE 19901. I, depose and say that on the2 day of _October, true copy of the Summons for Personal Service Outside the Petition in accordance with state statutes in the manner manner manner.	Robert DeLacy 20 20 at 10:40a .m., executed a set State of Missouri (Except Attach	, being duly sw service by delive
(x) REGISTERED AGENT SERVICE: By serving <u>Casey P</u> as <u>Authorized to Accept Service</u> for the ab	ineda	
() RECORDS CUSTODIAN SERVICE: By serving for the ab	•	
() CORPORATE SERVICE: By serving for the at	•	-
() OTHER SERVICE: As described in the Comments below	·	
() NON SERVICE: For the reason detailed in the Comment	s helow	
I certify that I have no interest in the above action, am of le which this service was made.	gal age and have proper authority	in the jurisdictio
which this service was made. Subscribed and Sworn to before me on the day	M//	in the jurisdictio
Subscribed and Sworn to before me on the _2_ day ofOf, Zozoby the affiant who is	PAOCESS SERVER #Appointed in accordance with	State Statutes
Subscribed and Sworn to before me on the day of,	PROCESS SERVER #_ Appointed in accordance with HPS Process Service & Inve www.hpsprocess.com 1669 Jefferson	State Statutes
Subscribed and Sworn to before me on the day of,	PROCESS SERVER #_ Appointed in accordance with HPS Process Service & Inve	State Statutes
Subscribed and Sworn to before me on the day of,	PROCESS SERVER #_ Appointed in accordance with HPS Process Service & Inve www.hpsprocess.com 1669 Jefferson Kansas City, MO 64108	State Statutes
Subscribed and Sworn to before me on the day of,	PROCESS SERVER #_ Appointed in accordance with HPS Process Service & Inve www.hpsprocess.com 1669 Jefferson Kansas City, MO 64108 (800) 796-9559 Our Job Serial Number: 2020	State Statutes
Subscribed and Sworn to before me on the day of,	PROCESS SERVER #_ Appointed in accordance with HPS Process Service & Inve www.hpsprocess.com 1669 Jefferson Kansas City, MO 64108 (800) 796-9559 Our Job Serial Number: 2020	State Statutes
Subscribed and Sworn to before me on the 2 day of 22 by the affiant who is personally known to me.	PROCESS SERVER #_ Appointed in accordance with HPS Process Service & Inve www.hpsprocess.com 1669 Jefferson Kansas City, MO 64108 (800) 796-9559 Our Job Serial Number: 2020	State Statutes



- Associa-		
Judge or Division: REX M BURLISON	Case Number: 2022-CC09988	
Plaintiff/Petitioner:	Plaintiff's/Petitioner's Attorney/Address:	
TINA POYNTER-ABELL	ANDREW KELLEY SMITH	
	SUITE 400	
	221 W LEXINGTON	
	vs. INDEPENDENCE, MO 64051	
Defendant/Respondent: 3M COMPANY	Court Address: CIVIL COURTS BUILDING	(Date File Stamp)
Nature of Suit:	10 N TUCKER BLVD	
CC Wrongful Death	SAINT LOUIS, MO 63101	
Summons for Pe	rsonal Service Outside the State of Mis (Except Attachment Action)	souri
The State of Missouri to: DYNAX CORPORA	ATION	
Allas:		2 -
CORPORATE SYSTEMS LLC, RAGT 3500 S DUPONT HIGHWAY DOVER, DE 19801		
	ed to appear before this court and to file your plead	ling to the netition, conv.of
Tou are continued	and to serve a copy of your pleading upon the atte	ornev for the
plaintiff/petitioner	at the above address all within 30 days after service	e of this summons upon
(2) you, exclusive of t	he day of service. If you fail to file your pleading, ju	dgment by default will be
	for the relief demanded in this action.	\$1.00E
	ber 28, 2020	
CITY OF ST LOUIS	ate C	rk W
Further Information:		
	cer's or Server's Affidavit of Service	
I certify that:	notions within the state or togitary where the chave sur-	
2. My official title is Process Server	actions within the state or territory where the above surr	ntv. Delaware (state).
3. I have served the above summons by:	check one)	
	nd a copy of the petition to the defendant/respondent.	
leaving a copy of the summons and	a copy of the petition at the dwelling place or usual about	de of the
over the age of 15 years who perma	a person of the defendant/respondent.	dant strespondent s lamily
(for service on a corporation) delive	ring a copy of the summons and a copy of the petition to	
Casey Pineda	(name) Authorized to Accept	Service (title).
other:		
Served at Corporate Systems, LLC, 3500		(address)
	y, <u>Delaware</u> (state), on <u>10/2/20</u> (dat	e) at10:40 am (time).
Robert DeLacy	<i>'\\ \\ \\</i>	
Printed Name of Sheriff or Server		Sheriff or Server
	m to before me this	(month) <u>292</u> (year).
I am: (check one)	the clerk of the court of which affiant is an officer. the judge of the court of which affiant is an officer.	
(Cont.	authorized to administer oaths in the state in which	the affiant served the above
(Seal)	summons. (use for out-of-state officer)	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,
	authorized to administer oaths. (use for court-appo	inted server) NGE H. CO
	Signature a	MM/s
Service Fees	/ C SIGNATURE 81	<u> </u>
Summons \$		EXPIRES Z
Non Est \$		三 : FEB. 13, 2022
	miles (A. C	- · · · · · · · · · · · · · · · · · · ·
Mileage \$((miles @ \$ per mile)	FEB. 13, 2022

Tribilitali gestigata e en gajos . . .

AFFIDAVIT OF SERVICE

State of Missouri	County of Saint Louis (City)	Circuit Cour
Case Number: 2022-CC09988		
Plaintiff/Petitioner: TINA POYNTER-ABELL, as Spa ABELL vs. Defendant/Respondent: BM COMPANY, et al.	ouse of and on behalf of Decedent ROBERT	
Manufacturing Co., c/o CSC-La 65101. I, DAVIO M. COS CT., 2020 at 2:26 Petition in accordance with state	ce & Investigations to be served on 3M Company, f/k/a awyers Incorporating Service Company, 221 Bolivar (Service), being duly sworn, depose and say that on the pm., executed service by delivering a true copy of the statutes in the manner marked below: ICE: By serving Arch Strong for the above-named entity.	Street, Jefferson City, MO the <u>6</u> 2_ day of Summons in Civil Case and
	RVICE: By servingfor the above-named entity.	
() CORPORATE SERVICE: By sas	serving for the above-named entity.	
) OTHER SERVICE: As describ		
) NON SERVICE: For the reason	n detailed in the Comments below.	
COMMENTS:		
		
certify that I have no interest in	the above action, am of legal age and have proper author	ority in the jurisdiction in

Subscribed and Sworn to before me on the day of by the affiant who is

personally known to me.

NOTARY PUBLIC

PATRICIA J. ROBERTS
Notary Public-Notary Seal
STATE OF MISSOURI-County of Cole
Commission #12481691

My Commission Expires Dec. 4, 2020

PROCESS SERVER # PROCES

HPS Process Service & Investigations www.hpsprocess.com
1669 Jefferson
Kansas City, MO 64108
(800) 796-9559

Our Job Serial Number: 2020018872

PORTON A ALBOYAGA OF THE CO. LE COMMENSAGE PRIME CONTRACTOR

Date Filed 11/02/20 2:21-cv-00365-RMG Entry Number 1-1 Page 59 of 103 ana alia 4 maga kuma kilipi dhatha ilipi dh ALABA - TATEY HOVEWINDER THE ! To a state of a second of a A SEPERADEWOOD NO BEACH 起热的人 拉姆尔 CATHURA COM CATE CONTRACTOR OF A CONTRACTOR OF THE CONTRACTOR OF T The state of the s MENTER OF STATE OF THE STATE OF Treft in The property of the engine of the control of file of come and of Foducinistation of the State of Sarvage which the best of the state of तिकार क्षेत्रकारीक्ष पुरावक विकास स्थापक ্ৰাক্ত কৰিবলৈ প্ৰতিষ্ঠাৰ আৰ্থিক কৰিবলৈ ক ইয়া কৰিবলৈ ika pilatan kalan ini kalan kalan kalan da da marang perioda dan dalah kalan menggan penggan ini Milatan. Penggan kalan ini dalah kalan ini dalah dalah menggan dan dalah kalan menggan penggan ini menggan penggan ber ર પ્રાથમિક સામિક કે કે ફોલામીક ૧૯ એક સ્થાર્થ કે કામ રાષ્ટ્રક મામલે કે માટે પ્રાથમિક કરે કે કે કે કે ફોલામાં રે a la cada la maratta da la calenta la calent

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कारत, मञ्चलकोटः । (१८) वर्षः स्वतः शादिकः । १ वर्षः इस्तोतिक स्वतः (१५०१) । स्वतः (१९) इस्तोतिक । १ वर्षः (१९)

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र स्वरूप हर्ने एसिसी सिसी होती होते होती है कि स्वरूप से उन्यों के स्वरूप र सरकार र सम्बद्ध सिक्ट के सम्बद्ध कर स्वरूप र स

Electronically Filed - City of St. Louis - October 22, 2020 - 09:32 AM



Judge or Division: REX M BURLISON	Case Number: 2022-CC09988	
Plaintiff/Petitioner: TINA POYNTER-ABELL	Plaintiff's/Petitioner's Attorney/Address ANDREW KELLEY SMITH	
	SUITE 400 221 W LEXINGTON vs. INDEPENDENCE, MO 64051	
Defendant/Respondent: 3M COMPANY	Court Address: CIVIL COURTS BUILDING	
Nature of Suit: CC Wrongful Death	10 N TUCKER BLVD SAINT LOUIS, MO 63101	(Date File Stamp)

C Wrongful Death	SAINT	LOUIS, WIO 63101	(Date File Stamp)
	Summon	s in Civil Case	
The State of Missouri to: CSC LAWYERS INC SERVICES (221 BOLIVAR STREET	Alias: FKA MINNESOTA. M	NING & MANUFACTURING CO COLE COUN	ITY, MO
JEFFERSON CITY, MO 65101 COURT SEAL OF	copy of which is attached, plaintiff/petitioner at the ab exclusive of the day of ser	ear before this court and to file your pand to serve a copy of your pleading love address all within 30 days after vice. If you fall to file your pleading, just e relief demanded in the petition.	upon the attorney for receiving this summons, udgment by default may
CITY OF ST LOUIS	September 28, 2020	Thomas Illoe Clerk	ppinger
	Date	Clerk	
	Further Information:		
certify that have served to delivering a copy of the sure leaving a copy of the sure 15 years who permane (for service on a corporation other: other: Served at 22	ummons should be returned to the above summons by: (check or summons and a copy of the petition mons and a copy of the petition ently resides with the defendant/reation) delivering a copy of the summons.	on to the defendant/respondent. at the dwelling place or usual abode of the, a person of the defendant's/responders. nmons and a copy of the complaint to: (name) Lesignee of Ceastre Joy Mo Signature of Si	defendant/respondent with ent's family over the age of
Sheriff's Fees, If applicable Summons Non Est Sheriff's Deputy Salary Supplemental Surcharge Mileage	\$\$ \$10.00 \$ (mil \$ a copy of the petition must be ser	PATRIC Notary P STATE OF MIS Commis	CIA J. ROBERTS ublic-Notary Seal iSOURI-County of Cole ssion #12481691 on Empires Dec. 4, 2020 thods of service on all

Circuit Court

AFFIDAVIT OF SERVICE

County of Saint Louis (City) State of Missouri

Case Number: 2022-CC09988

Plaintiff/Petitioner:

TINA POYNTER-ABELL, as Spouse of and on behalf of Decedent

ROBERT ABELL

VS.

Defendant/Respondent: 3M COMPANY, et al.

Received by HPS Process Service & Investigations to be served on Corteva, Inc. c/o CT Corporation System, 120 South Central Avenue, Clayton, MO 63105.

I, MARTIN HUECKEL, being duly sworn, depose and say that on the 1st day of October, 2020 at 2:14 pm, 1:

Served the within named establishment by delivering a true copy of Summons in Civil Case; and Petition to Bonnie Love, POS Intake Specialist at the address of 120 South Central Avenue, Clayton, MO 63105.

I am over the age of eighteen, and have no interest in the above action.

MARTIN HUECKEL **Process Server**

HPS Process Service & Investigations www.hpsprocess.com 1669 Jefferson Kansas City, MO 64108 (800) 796-9559

Our Job Serial Number: HAT-2020018873

Subscribed and Sworn to before me on the Ze ZO by the affiant who day of october is personally known to me.

SHELBY ROBERTS My Commission Expires January 28, 2023 St. Louis County

Commission #19503579 1992-2020 Database Services, Inc. - Process Server's Toolbox V8.11

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SHELBY ROBERTS My Commission Expires January 28, 2023 St Louis County Commission #19503579

Electronically Filed - City of St. Louis - October 14, 2020 - 02:52 PM

IN THE 22ND JUDICIAL CIRCUIT, CITY OF ST LOUIS, MISSOURI

Judge or Division: REX M BURLISON	Case Number: 2022-CC09988	
Plaintiff/Petitioner: TINA POYNTER-ABELL	Plaintiff's/Petitioner's Attorney/Addr ANDREW KELLEY SMITH SUITE 400 221 W LEXINGTON vs. INDEPENDENCE, MO 64051	ress
Defendant/Respondent: 3M COMPANY	Court Address: CIVIL COURTS BUILDING	
Nature of Suit: CC Wrongful Death	10 N TUCKER BLVD SAINT LOUIS, MO 63101	(Date File Stamp)
	Summons in Civil Case	
The State of Missouri to: CORTEV Alias:	A, INC.	
CT CORPORATION SYSTEM, RAGT 120 SOUTH CENTRAL AVENUE		ST LOUIS COUNTY SHERIFF

Entry Number 1-1

		221 W LEXINGTON				
	VS.	INDEPENDENCE, MO 64051				
Defendant/Respondent:		Court Address: CIVIL COURTS BUILDING				
3M COMPANY		10 N TUCKER BLVD				
Nature of Suit:		SAINT LOUIS, MO 63101				
CC Wrongful Death				(Date File Stamp)		
,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	Sui	mmons in Civil Case				
The State of Missouri to	: CORTEVA, INC. Alias:					
CT CORPORATION SYSTEM, I 120 SOUTH CENTRAL AVENU CLAYTON, MO 63105	RAGT			COUNTY SHERIFF		
COURT SEAL OF	copy of which is a plaintiff/petitioner	d to appear before this court and ttached, and to serve a copy of y at the above address all within 3 ay of service. If you fail to file you ou for the relief demanded in the	our pleading to to days after re ur pleading, ju e petition.	eceiving this summons, adgment by default may		
CITY OF ST LOUIS	September 28,	2020	Romas Kloej	ypinger		
	Date ·		Clerk			
	Further Information:					
	SI	heriff's or Server's Return	_	i		
Note to serving officer:	Summons should be retu	rned to the court within 30 days after the	he date of issue.			
I certify that I have serve	d the above summons by	: (check one)				
leaving a copy of the	summons and a copy of t	of the petition to the defendant/respond the petition at the dwelling place or usur , a person of the defendant		lefendant/respondent with nt's family over the age of		
15 years who perma	nently resides with the department of the department of the delivering a copy	of the summons and a copy of the con (name)	nplaint to:	(title).		
F-7						
Served at 120 S	. Central Auc	, Olaylon, NO 6 ity of St. Louis), MO, on No 12/2	3105	(address)		
in <u>STZ 041'S</u>	(County/C	ity of St. Louis), MO, on 10/2/2	<u>e 20</u> (dal	ie) at <u>Z:/Yau</u> (time).		
Martin	Hyecus	Moi	To Accel			
Printed Name of Sheriff or Server Must be sworn before a notary public if not served by an authorized officer:						
			070)	(date).		
/C!!	Subscribed and sworn t	o before the on	00 00 -	DO A		
(Seal)	My commission expires	: <u> </u>	Shells	ary Public		
Sheriff's Fees, if applicat			SARY PUSS	SHELBY ROBERTS		
Summons	\$		MOTARY	My Commission Expires January 28, 2023		
Non Est	\$		to SEAL	St. Louis County		
Sheriff's Deputy Salary			The Market	Commission #19503579		
Supplemental Surcharge	\$ 10.00		N. W. Willy	•		
Mileage	\$(miles @ \$ per mile)				
-	\$			hade of service on all		
A copy of the summons as classes of suits, see Supre	nd a copy of the petition neme Court Rule 54.	nust be served on each defendant/resp	onaent. For met	TIOOS OF SELVICE OF SIL		

SHELBY ROBERTS
ify Commission Expires
January 28, 2023
St Louis County
Commission #19503575



AFFIDAVIT OF SERVICE

Circuit Court County of Saint Louis (City) State of Missouri

Case Number: 2022-CC09988

Plaintiff/Petitioner:

TINA POYNTER-ABELL, as Spouse of and on behalf of Decedent

ROBERT ABELL

VS.

Defendant/Respondent: 3M COMPANY, et al.

Received by HPS Process Service & Investigations to be served on E.I. Dupont De Nemours, Inc., Alias: FKA Dowdupont, Inc., Dowpupont c/o CT Corporation System, 120 South Central Avenue, Clayton, MO 63105.

I, MARTIN HUECKEL, being duly sworn, depose and say that on the 1st day of October, 2020 at 2:14 pm, 1:

Served the within named with a true copy of the Summons in Civil Case; and Petition by leaving with Bonnie Love, POS Intake Specialist at 120 South Central Avenue, Clayton, MO 63105.

I am over the age of eighteen, and have no interest in the above action.

MARTIN HUECKEL **Process Server**

HPS Process Service & Investigations www.hpsprocess.com 1669 Jefferson Kansas City, MO 64108 (800) 796-9559

Our Job Serial Number: HAT-2020018874

Subscribed and Sworn to before me on the _ <u>כס≥</u> by the affiant who day of October is personally known to me.

SHELBY ROBERTS My Commission Expires January 28, 2023 St. Louis County

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Electronically Filed - City of St. Louis - October 14, 2020 - 02:52 PM

40					
Judge or Division:		Case Number: 2022-CC09988			
REX M BURLISON					
Plaintiff/Petitioner:		Plaintiff's/Petitioner's Attorney/Ad	ldress		
		ANDREW KELLEY SMITH			
TINA POYNTER-ABELL		SUITE 400			
		221 W LEXINGTON			
•	vs.	INDEPENDENCE, MO 64051			
Defendant/Respondent:		Court Address:			
3M COMPANY		CIVIL COURTS BUILDING			
	***************************************	10 N TUCKER BLVD			
Nature of Suit:		SAINT LOUIS, MO 63101		(Date File Stamp)	
CC Wrongful Death	Sur	nmons in Civil Case			
The State of Missouri to:	ELDUPONT DE NE	MOURS INC	<u> </u>		
1110 Otato Or 11110000111100	Alias: FKA DOWDU	PONT INC, DOWPUPONT			
C T CORPORATION SYSTEM		1			
120 SOUTH CENTRAL AVE			STLOUIS	COUNTY SHERIFF	
CLAYTON, MO 63105					
COURT SEAL OF	Vallana alimmana	d to appear before this court and	to file your p	leading to the petition, a	
OURTO	conv of which is at	tached, and to serve a copy of y	rour pleading	upon the attorney for	
	nlaintiff/natitioner	at the above address all within 3	0 days after r	eceiving this summons,	
(3/(3)	evaluative of the da	y of service. If you fail to file you	ur pleading, lu	idgment by default may	
(3)(1)(2)(3)(3)(3)(4)(4)(4)(4)(4)(4)(4)(4)(4)(4)(4)(4)(4)	he taken against v	ou for the relief demanded in the	petition.		
				•	
CITY OF ST LOUIS	September 28,	2020	Lower Play	yringer	
	Date		Clerk	······································	
	Further Information:				
	SI	neriff's or Server's Return			
Note to serving officer:	Summons should be retu	med to the court within 30 days after the	he date of issue.		
I certify that I have served the above summons by: (check one)					
delivering a copy of the summons and a copy of the petition to the defendant/respondent. leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the defendant/respondent with leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the defendant/respondent with					
leaving a copy of the s	ummons and a copy of the	ia nationali me owellon mace di usu	ai abouc oi ilic c	ent's family over the age of	
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- 1 / /	nently resides with the de	of the cummons and a conv of the con	nplaint to:		
(for service on a corporation) delivering a copy of the summons and a copy of the complaint to: Torrection Corporation Co					
other:				·	
C Outer.	, , ,	1 / 1/205	_		
Served at 120 5. C	entral Her, C	lay fon, MO 63/05 by of St. Louis), MO, on 10/2/	·	(address)	
in ST Coga	(County/Ci	ty of St. Louis), MO, on/O/2/		te) at <u>214pm</u> (time).	
,	11 10	marty	Heachel		
MARTIN	Nacher	p rea a	Signature of Sh	eriff or Server	
Printed Name	of Sheriff or Server	otary public if not served by an authoriz	ed officer:		
	Subscribed and sworn to		520	(date).	
(Seal)	Subscribed and sworn k	3 DOIO10 1110 011	-0.00 -	1 0	
(Obal)	My commission expires:	1/28/23	Kelby 5	obers	
		Date	Not	ary Public	
Sheriff's Fees, if applicable	e		NARY PUBL	SHELBY ROBERTS	
Summons	\$		NOTARY	My Commission Expires	
Non Est	\$		SEAL S	January 28, 2023 St. Louis County	
Sheriff's Deputy Salary			OF MISS	Commission #19503579	
Supplemental Surcharge	\$ <u>10.00</u>		77770		
Mileage	\$(_	miles @ \$ per mile)			
Total	\$			todo of popular an all	
A copy of the summons and	d a copy of the petition m	ust be served on each defendant/resp	ondent. For met	noos of service on all	
classes of sults, see Supre	me Court Rule 54.				



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AFFIDAVIT OF SERVICE

State of Missouri

County of St. Louis

Circuit Court

Case Number: 2022-CC09988

Plaintiff/Petitioner:

TINA POYNTER-ABELL

VS.

Defendant/Respondent: 3M COMPANY, et. al.

Received by HPS Process Service & Investigations to be served on Leo M. Ellebracht Company, Alias: SUCC Ellebracht Fire Apparatus Service Inc. c/o Lloyd A. Dewalld, Registered Agent, 104 Mullach Court, Suite 1028, Wentzville, MO 63385.

I, MARTIN HUECKEL, being duly sworn, depose and say that on the 29th day of September, 2020 at 11:33 am, I:

Served the within named establishment by delivering a true copy of Summons in Civil Case; and Petition to Marie Dewalld, Owner at the address of 104 Mullach Court, Suite 1028, Wentzville, MO 63385.

I am over the age of eighteen, and have no interest in the above action.

Subscribed and Sworn to before me on the 30 day of September 2020 by the affiant who is personally known to me.

NOTARY PUBLIC

を記載し

SHELBY ROBERTS My Commission Expires January 28, 2023 St. Louis County Commission #19503579 MARTIN HUECKEL Process Server

HPS Process Service & Investigations www.hpsprocess.com 1669 Jefferson Kansas City, MO 64108 (800) 796-9559

Our Job Serial Number: HAT-2020018577

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Judge or Division: REX M BURLISON	Case Number: 2022-CC09988	
Plaintiff/Petitioner: TINA POYNTER-ABELL vs	Plaintiff's/Petitioner's Attorney/Address ANDREW KELLEY SMITH SUITE 400 221 W LEXINGTON INDEPENDENCE, MO 64051	
Defendant/Respondent: 3M COMPANY	Court Address: CIVIL COURTS BUILDING	
Nature of Suit: CC Wrongful Death	10 N TUCKER BLVD SAINT LOUIS, MO 63101	(Date File Stamp)

	VS.	INDEPENDENCE, MO 64051		
Defendant/Respondent:		Court Address:		
3M COMPANY		CIVIL COURTS BUILDING		
Nature of Suit:		10 N TUCKER BLVD		
CC Wrongful Death	30 7	SAINT LOUIS, MO 63101	***************************************	(Date File Stamp)
	Sui	mmons in Civil Case		
The State of Missouri to			***************************************	
LLOYD A DEWALD, RAGT	Alias: SUCC ELLE	BRACHT FIRE APPARATUS SEI	RVICE INC	
104 MULLACH CT SUITE 102	3		annous	PA PA AN AN AN AN AN AN AN AN AND AND AND AN
WENTZVILLE, MO 63385			SPECIAL	PROCESS SERVER
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COURTOR		tached, and to serve a copy of		
	plaintiff/petitioner	at the above address all within	30 days after r	eceiving this summons.
(8/\7\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\	exclusive of the da	y of service. If you fail to file yo	ur pleading, ju	
(2)(2)	be taken against ye	ou for the relief demanded in th		
CITY OF ST LOUIS	September 28, 1	2020	Lowar More	ylinger
Citt or St Loois		***************************************	Thomas Morpyinger	
	Date		Clerk	
	Further Information:	eriff's or Server's Return		
15 years who perma	nently resides with the deforation) delivering a copy of	endant/respondent. If the summons and a copy of the con (name)		nt's family over the age of (title).
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in STLOOIS	10	of St. Louis), MO, on 9/29/2	25 Te	(address)
n 21200113	2	y of St. Louis), MO, on	usp)	e) at 1/32am (time).
Martin	Sachel	Mas	tin Hero	chil
Printed Nam	e of Sheriff or Server	- Jakoba da	Signature of She	riff or Server
		tary public if not served by an authoriz		Nara.
(Seal)	Subscribed and sworn to	before me on 9/29/2	020	(date).
(Ocal)	My commission expires:	1/28/23	Thelps / wit	200
	Date		Notary Public	
Sheriff's Fees, if applicab	le		KARY PUACE	SHELBY ROBERTS
Summons	\$		NOTARY 6	My Commission Expires
Non Est	\$		SEAL S	January 28, 2023 St. Louis County
Sheriff's Deputy Salary Supplemental Surcharge	\$ 10.00		OF MISS	Commission #19503579
Mileage	\$ (miles @ \$ per mile)		
Total	\$			
A copy of the summons and		st be served on each defendant/respo	ondent. For meth	ods of service on all
classes of suits, see Supre	me Court Rule 54.			

AFFIDAVIT OF SERVICE

State of Missouri County of Saint Louis (City) **Circuit Court**

Case Number: 2022-CC09988

Plaintiff/Petitioner:

TINA POYNTER-ABELL, as Spouse of and on behalf of Decedent

ROBERT ABELL

VS.

Defendant/Respondent: 3M COMPANY, et al.

Received by HPS Process Service & Investigations to be served on Raytheon Technologies Corporation, Alias: SUCC United Techologies Corporation c/o CT Corporation System, 120 South Central Avenue, Clayton, MO 63105.

I. MARTIN HUECKEL, being duly sworn, depose and say that on the 1st day of October, 2020 at 2:14 pm,

Served the within named establishment by delivering a true copy of Summons in Civil Case; and Petition to Bonnie Love, POS Intake Specialist at the address of 120 South Central Avenue, Clayton, MO 63105.

I am over the age of eighteen, and have no interest in the above action.

MARTIN HUECKEL **Process Server**

HPS Process Service & Investigations www.hpsprocess.com 1669 Jefferson Kansas City, MO 64108 (800) 796-9559

Our Job Serial Number: HAT-2020018877

Subscribed and Sworn to before me on the _____ day of _____ by the affiant who is personally known to me.

SHELBY ROBERTS My Commission Expires January 28, 2023 St. Louis County

Commission #19503570 1992-2020 Database Services, Inc. - Process Server's Toolbox V8.1t

Electronically Filed - City of St. Louis - October 14, 2020 - 02:52 PM

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SHELBY ROBERTS My Commission Expires January 28, 2023 St Louis County Commission #19503578

Judge or Division:		Case Number: 20	22-CC09988		
REX M BURLISON					
Plaintiff/Petitioner:		Plaintiff's/Petitioner	's Attorney/Ad	dress	**************************************
TINA POYNTER-ABELL		ANDREW KELLEY			
TINA POTNTER-ABELL		SUITE 400			
		221 W LEXINGTO	V	}	
	VS.	INDEPENDENCE,	MO 64051		
Defendant/Respondent:		Court Address:			
3M COMPANY		CIVIL COURTS BU			
Nature of Suit:		10 N TUCKER BLV			
CC Wrongful Death		SAINT LOUIS, MO	63101		(Date File Stamp)
	Su	mmons in Civ	I Case		
The State of Missouri to	_				
The State of Missouri to	Alias: SUCC UNITE	ED TECHNOLOGIES	CORPORAT	ION	
CT CORPORATION SYSTEM,			1		
120 SOUTH CENTRAL AVE				STLOUIS	COUNTY SHERIFF
CLAYTON, MO 63105					
COURT SEAL OF	Vou ara cummone	d to appear before	this court and	to file your pl	eading to the petition, a
OURT OF	aanu af which ie s	ttached and to sen	se a conv of v	our pleading u	pon the attorney for
	niaintiff/netitioner	at the above address	ss all within 3	O days after re-	ceiving this summons,
(3) (3) (3) (3) (3) (4) (4) (4) (4) (4) (4) (4) (4) (4) (4	exclusive of the d	av of service. It vou	fail to file you	ar pleading, jud	igment by default may
(3)(3)(3)(3)	be taken against y	ou for the relief der	nanded in the	petition.	
			7	Pour Ulner	Melmane s
CITY OF ST LOUIS	September 28,	2020	• •	Lowar Kloep	The state of the s
	Date	**************		Clerk	
	Further Information:				
	S	heriff's or Server's	Return		
Note to serving officer:	Summons should be retu	irned to the court within	30 days after ti	ne date of issue.	
I certify that I have serve	d the above summons by	r: (check one)			
		of the notition to the def	endant/respond	ent.	d la
leaving a copy of the	summons and a copy of t	ווופוווח פחז זה מתווומת אמי	nn niace oi usid	41 41100B OLUBE UC	t's family over the age of
		a per	son of the deten	dant s/responden	t's family over the age of
15 years who perma	nently resides with the de	erenganviespoliceili.	copy of the con	nolaint to:	
(for service on a corp	7 ce (ove	(name)	CFANI	TAKE SPEC	title).
[other:					***************************************
Served at 1205 in 57 cod	- / / /	1 /	120	21.00	de debene m
Served at 1205	Contral H	ve, Clayur,	1106	2/03	(address)
in 57 (0)4	(County/C	ity of St. Louis), MO, or	10/1/2	dete) at 2/4pm (time).
	4	<i>n</i>	1	7 /	60
musti	n threcke	J	Ma	Ten Ken	
Printed Nam	e of Sheriff or Server			Signature of Sher	riff or Server
	Must be sworn before a		id by an authoriz としとして	ed officer:	d-4-\
	Subscribed and sworn to	to before me on	(0/2/2	(date).
(Seal)	My commission expires	" 10C/22	\sim S(Dellas Ta	she est
	My commission expires	Dete Dete		Notar	y Public
Charles Con Hampling				338V BACA	SHELBY ROBERTS
Sheriff's Fees, if applicate Summons	,,,, \$			SOLDE LOS	My Commission Expires
Non Est	\$			NUIARY	January 28, 2023
Sheriff's Deputy Salary	***************************************			SEAL S	St. Louis County
Supplemental Surcharge	\$ 10.00			E OF WILLS	Commission #19503579
Mileage	\$(miles @ \$	per mile)		
Takal	\$				
A copy of the summons ar	nd a copy of the petition n	nust be served on each	defendant/resp	ondent. For meth	ods of service on all
classes of sults, see Supre	eme Court Rule 54.				

2:21-cv-00365-RMG Date Filed 11/02/20 Entry Number 1-1 Page 74 of 103

SHELBY ROBERTS

!Ay Commission Expires

January 28, 2023

St. Louis County

Commission #19503576



<u>AFFIDAVIT OF SERVICE</u>

State of Missouri

County of St. Louis

Circuit Court

Case Number: 2022-CC09988

Plaintiff/Petitioner:

TINA POYNTER-ABELL

VS.

Defendant/Respondent: 3M COMPANY, et. al.

Received by HPS Process Service & Investigations to be served on Sentinel Emergency Solutions, LLC c/o Charles A. Hurth, III., Registered Agent, 301 East Main Street, Union, MO 63084.

I, MARTIN HUECKEL, being duly sworn, depose and say that on the 29th day of September, 2020 at 12:24 pm, I:

Served the within named with a true copy of the Summons in Civil Case; and Petition by leaving with Ashley Thornburg, Paralegal at 301 East Main Street, Union, MO 63084.

I am over the age of eighteen, and have no interest in the above action.

Subscribed and Sworn to before me on the 30 day of September 2030 by the affiant who

is personally known to me.

NOTARY, PUBLIC

SHELBY ROBERTS My Commission Expires January 28, 2023 St. Louis County Commission #19503579 MARTÍN HUECKEL Process Server

HPS Process Service & Investigations www.hpsprocess.com 1669 Jefferson Kansas City, MO 64108 (800) 796-9559

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Our Job Serial Number: HAT-2020018576

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Electronically Filed - City of St. Louis - October 06, 2020 - 01:23 PM



Judge or Division: REX M BURLISON	Case Number: 2022-CC09988	
Plaintiff/Petitioner: TINA POYNTER-ABELL vs.	Plaintiff's/Petitioner's Attorney/Address ANDREW KELLEY SMITH SUITE 400 221 W LEXINGTON INDEPENDENCE, MO 64051	
Defendant/Respondent: 3M COMPANY	Court Address: CIVIL COURTS BUILDING	
Nature of Suit: CC Wrongful Death	10 N TUCKER BLVD SAINT LOUIS, MO 63101	(Date File Stamp
Contraction of the Contraction o	mmons in Civil Case	Logie File Stat

Nature of Suit:		1 10 6 11 6 6 5 5 5 5 5 7 7		
CC Meanaful Dooth		10 N TUCKER BLVD SAINT LOUIS, MO 631	01	(Data Cile Steam)
CC Wrongful Death	· · ·	mmons in Civil C		(Date File Stamp)
WALL COLUMN FROM TA				
The State of Missouri to	o: SENTINEL ENIEKG Alias:	ENCY SOLUTIONS, LLC		
CHARLES A HURTH, III, RAG	- Stranger and Company		- Control Cont	***************************************
301 E MAIN ST			SPECIALP	ROCESS SERVER
UNION, MO 63084			and and anthropy of the same	a transmit the commence of the control of the contr
COURT SEAL OF	You are summone	d to appear before this o	ourt and to file your ple	ading to the petition, a
COURTOR			copy of your pleading up	
(5) (5)			within 30 days after rec	
(3((18))(2)		ly of service. If you fall t ou for the relief demand	o file your pleading, judg	gment by default may
	ne raken adamer A	ou los me tenes demand	4	4
CITY OF ST LOUIS	September 28,	2020	Thomas Ploepy	mayer.
	Date	NOTIFE SANAMA	Clerk	
	Further Information:			
	Q)	eriff's or Server's Retur	n	
other:			of the complaint to:	······································
Served at 120 5	Centrol Ac	ie, Claytoni.	MO 63/05	(address)
in 97 600	County/Cit	y of St. Louis), MO, on	/29/2070 (date)	at 1222pm (time).
Moder !	Herecke!	7	manto Avedas	7
Printed Nam	e of Sheriff or Server	otary public if not served by a	Signature of Sheriff	or Server
	Subscribed and sworn to	before me on	29/2020 (da	ate),
(Seal)	Subscribed and sworn to	belote the on	9000	10-4-
	My commission expires:	1/80/3/3	Notary	Public
Ob 160 Face 16 applicate	Jan	Date	, interest, in the second	1 Carrie
Sheriff's Fees, if applicab Summons	S S		ARY PUS	SHELBY ROBERTS
Non Est	\$		NOTARY :	My Commission Expires January 28, 2023
Sheriff's Deputy Salary			SEAL S	St. Louis County
Supplemental Surcharge	\$ 10.00		OF MISSE	Commission #19503579
Mileage	\$(_	miles @ \$ per	mile)	
Total	\$			
A copy of the summons an	* 1000000000000000000000000000000000000	and the second second second second	Intelligence and and Properties	le of contion on all

State of Missouri

County of Saint Louis (City)

Circuit Court

Electronically Filed - City of St. Louis - October 14, 2020 - 02:52 PN

Case Number: 2022-CC09988

Plaintiff/Petitioner:

TINA POYNTER-ABELL, as Spouse of and on behalf of Decedent

ROBERT ABELL

VS.

Defendant/Respondent: 3M COMPANY, et al.

Received by HPS Process Service & Investigations to be served on The Chemours Company FC, LLC c/o CT Corporation System, 120 South Central Avenue, Clayton, MO 63105.

I, MARTIN HUECKEL, being duly sworn, depose and say that on the 1st day of October, 2020 at 2:14 pm, I:

Served the within named with a true copy of the Summons in Civil Case; and Petition by leaving with Bonnie Love, POS Intake Specialist at 120 South Central Avenue, Clayton, MO 63105.

I am over the age of eighteen, and have no interest in the above action.

MARTIN HUECKEL Process Server

HPS Process Service & Investigations www.hpsprocess.com 1669 Jefferson Kansas City, MO 64108 (800) 796-9559

J Ause hel

Our Job Serial Number: HAT-2020018878

Subscribed and Sworn to before me on the 3 day of Office 3020 by the affiant who is personally known to me.

NOTARY DURING

NOTARY SEAL S

SHELBY ROBERTS
My Commission Expires
January 28, 2023
St. Louis County

Commission #19503579
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2:21-cv-00365-RMG Date Filed 11/02/20 Entry Number 1-1 Page 78 of 103



Judge or Division:	Case Number: 2022-CC09988		
REX M BURLISON			
	Plaintiff's/Petitioner's Attorney/Ad-	dress	
Plaintiff/Petitioner:	ANDREW KELLEY SMITH	4.000	
TINA POYNTER-ABELL	SUITE 400		
	221 W LEXINGTON		
	INDEPENDENCE, MO 64051		
VS.	Court Address:		
Defendant/Respondent:	CIVIL COURTS BUILDING		
3M COMPANY	10 N TUCKER BLVD		
Nature of Suit:	SAINT LOUIS, MO 63101		
CC Wrongful Death	SAINT LOOIS, MO 00101		(Date File Stamp)
	mmons in Civil Case		
The State of Missouri to: THE CHEMOURS C			
	OWIPAINT TO, LLO		
Alias: CT CORPORATION SYSTEM, RAGT			
120 SOUTH CENTRAL AVENUE		STI OHIS CO	OUNTY SHERIFF
CLAYTON, MO 63105		31 1001301	JONET OF LETTER !
·			diverse the notition of
COURT SEAL OF You are summone	d to appear before this court and	to the your plea	and to the betition, a
CONTRICT CONV. of which is a	Hached, and to serve a copy of v	our pleauing upo	Mi file afformed to
plaintiff/petitioner	at the above address all within 3	u days after rece	ment by default may
exclusive of the da	ay of service. If you fail to file you	ir pieading, judgi	ment by detacit may
্টা be taken against y	ou for the relief demanded in the	petition.	
Contourbour 20	2020	Roman Blocan	male
CITY OF ST LOUIS September 28,	2020	Roman Kloepp	0
Date		Clerk	
Further Information:			
Purtner information.	heriff's or Server's Return		
Note to serving officer: Summons should be retu	rned to the court within 30 days after the	ne date of issue.	
I certify that I have served the above summons by	(check one)		
The same of the sa	s the notition to the defendant/respond	ent.	1
leaving a copy of the summons and a copy of the summons are sufficient to the summons are sufficient to the summons and a copy of the summons are sufficient to the summon are s			ndant/respondent with
	, a person or the determ	dant's/respondent's	family over the age of
15 years who permanently resides with the de	fondant/respondent		
(for service on a corporation) delivering a copy	of the summons and a copy of the corr	rplaint to:	(title).
(for service on a corporation) delivering a copy	(name) <u>INTARC</u>	SALC.	(une).
other:			······································
2 6 0 1	re, Clayton, mo	63105	_ (address)
Served at 120 S. Contral Att	se, cragina in	4	
in STOXIS (County/C		/	
in 57 COCTS (County/C	ity of St. Louis), MO, on	2020 (date) a	it <u>219 pm</u> (time).
<u> </u>	ity of St. Louis, MO, on	2020 (date) a	it <u>219 pm</u> (time).
montin Huecker	ity of St. Louis, MO, on	istin Have	che O
Montin Hueckel		Signature of Sheriff	che O
Montin Luc Cles Printed Name of Sheriff or Server Must be sworn before a r	notary public if not served by an authoriz	Signature of Sheriff ed officer:	or Server
Montin Hueckel	notary public if not served by an authoriz	Signature of Sheriff ed officer:	che O
Printed Name of Sheriff or Server Must be sworn before a r Subscribed and sworn t	notary public if not served by an authoriz o before me on	Signature of Sheriff ed officer:	or Server
Printed Name of Sheriff or Server Must be sworn before a r Subscribed and sworn t	notary public if not served by an authorize before me on	Signature of Sheriff ed officer:	or Server
Printed Name of Sheriff or Server Must be sworn before a r Subscribed and sworn t (Seal) My commission expires	notary public if not served by an authoriz o before me on	Signature of Sheriff ed officer:	or Server ite). Public
Printed Name of Sheriff or Server Must be sworn before a r Subscribed and sworn t (Seal) My commission expires Sheriff's Fees, if applicable	notary public if not served by an authorize before me on	Signature of Sheriff ed officer: (da Notary F	or Server ite). Public SHELBY ROBERTS
Printed Name of Sheriff or Server Must be sworn before a r Subscribed and sworn t (Seal) My commission expires Sheriff's Fees, if applicable Summons \$	notary public if not served by an authorize before me on	Signature of Sheriff ed officer: (da Notary F	or Server ite). Public SHELBY ROBERTS My Commission Expires
Printed Name of Sheriff or Server Must be sworn before a r Subscribed and sworn t (Seal) My commission expires Sheriff's Fees, if applicable Summons Non Est \$	notary public if not served by an authorize before me on	Signature of Sheriff ed officer: (da Notary F	or Server ite). Public SHELBY ROBERTS My Commission Expires January 28, 2023
Printed Name of Sheriff or Server Must be sworn before a r Subscribed and sworn t (Seal) My commission expires Sheriff's Fees, if applicable Summons Non Est Sheriff's Deputy Salary	notary public if not served by an authorize before me on	Signature of Sheriff ed officer: 20 20 (da Notary F NOTARY SEAL	or Server ite). Public SHELBY ROBERTS My Commission Expires January 28, 2023 St. Louis County
Printed Name of Sheriff or Server Must be sworn before a r Subscribed and sworn t (Seal) My commission expires Sheriff's Fees, if applicable Summons Non Est Sheriff's Deputy Salary Supplemental Surcharge \$ 10.00	notary public if not served by an authorize to before me on	Signature of Sheriff ed officer: 20 20 (da Notary F NOTARY SEAL	or Server ite). Public SHELBY ROBERTS My Commission Expires January 28, 2023
Printed Name of Sheriff or Server Must be sworn before a r Subscribed and sworn t (Seal) My commission expires Sheriff's Fees, if applicable Summons Non Est Sheriff's Deputy Salary Supplemental Surcharge Mileage \$	notary public if not served by an authorize before me on	Signature of Sheriff ed officer: 20 20 (da Notary F NOTARY SEAL	or Server ite). Public SHELBY ROBERTS My Commission Expires January 28, 2023 St. Louis County
Printed Name of Sheriff or Server Must be sworn before a r Subscribed and sworn t (Seal) My commission expires Sheriff's Fees, if applicable Summons Non Est Sheriff's Deputy Salary Supplemental Surcharge \$ 10.00	notary public if not served by an authoriz to before me on	Signature of Sheriff ed officer: 20 20 (da Notary F	or Server ite). Public SHELBY ROBERTS My Commission Expires January 28, 2023 St. Louis County Commission #19503579

Electronically Filed - City of St. Louis - October 14, 2020 - 02:52 PM

classes of suits, see Supreme Court Rule 54.



AFFIDAVIT OF SERVICE

Circuit Court County of Saint Louis (City) State of Missouri

Case Number: 2022-CC09988

Plaintiff/Petitioner:

TINA POYNTER-ABELL, as Spouse of and on behalf of Decedent

ROBERT ABELL

VS.

Defendant/Respondent: 3M COMPANY, et al.

Received by HPS Process Service & Investigations to be served on TYCO Fire Products, L.P., Alias: SUCC The Ansul Company c/o CT Corporation System, 120 South Central Avenue, Clayton, MO 63105.

I, MARTIN HUECKEL, being duly sworn, depose and say that on the 1st day of October, 2020 at 2:14 pm,

Served the within named with a true copy of the Summons in Civil Case; and Petition by leaving with Bonnie Love, POS Intake Specialist at 120 South Central Avenue, Clayton, MO 63105.

I am over the age of eighteen, and have no interest in the above action.

MARTIN HUECKEL **Process Server**

HPS Process Service & Investigations www.hpsprocess.com 1669 Jefferson Kansas City, MO 64108 (800) 796-9559

monto Huchal

Our Job Serial Number: HAT-2020018880

Subscribed and Sworn to before me on the 🗾 day of October 2020 by the affiant who is personally known to me.

SHELBY ROBERTS My Commission Expires January 28, 2023 St. Louis County Commission #19503579

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SHELBY ROBERTS
My Commission Explies
January 25, 2023
St. Louis County
Commission #19503576

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W THE ZZING	SODIOIAL OIRO	517, 0177 07 07 20010, 11110		
Judge or Division:	***************************************	Case Number: 2022-CC09988		
REX M BURLISON				
Plaintiff/Petitioner:		Plaintiff's/Petitioner's Attorney/Ad	dress	
TINA POYNTER-ABELL		ANDREW KELLEY SMITH		
		SUITE 400 221 W LEXINGTON		
	vs.	INDEPENDENCE, MO 64051		
Defendant/Respondent:		Court Address:		
3M COMPANY		CIVIL COURTS BUILDING 10 N TUCKER BLVD		
Nature of Suit:		SAINT LOUIS, MO 63101		(Date File Stamp)
CC Wrongful Death				(Date File Starry)
		mmons in Civil Case		
The State of Missouri to:	TYCO FIRE PRODU	ICTS L.P. NSIII COMPANY		
CT CORPORATION SYSTEM, R		(4402 00111 2111	<u> </u>	
120 SOUTH CENTRAL AVENUE GLAYTON, MO 63105			STLOUIS	COUNTY SHERIFF
CLATION, NIO 63103				
COURT SEAL OF	You are summone	d to appear before this court and ttached, and to serve a copy of y	I to file your p	upon the attorney for
	nlaintiff/natitioner	at the above address all within 3	8 davs after r	eceiving this summons, \parallel
3/32 3/8	exclusive of the da	ly of service. If you fall to file you	ur pleading, jt	idgment by default may
(5) (1) (5) (5)	be taken against y	ou for the relief demanded in the	e petition.	
THE COST	September 28,	2020	Lonas Kloy	njunger
CITY OF ST LOUIS	•		Clerk	, 0
	Date South as Information:		Olon	
	Further Information:	eriff's or Server's Return		
Note to serving officer: S	Summons should be retu	med to the court within 30 days after the	he date of issue.	
I certify that I have served	the above summons by:	(check one)	ont	•
delivering a copy of the	summons and a copy of the summons and a copy	f the petition to the defendant/respond ne petition at the dwelling place or usu		defendant/respondent with
		a person of the determ	dant's/responde	ent's family over the age of
TV/See complete on a corner	ently resides with the de	of the summons and a copy of the con	nplaint to:	
Tanna	Love	(name) INTAKE	spec.	(title).
other:				······································
Served at 120	S. Central,		63105	(address)
in STOUIS	(County/Ci	ty of St. Louis), MO, on	2028 (da	te) at <u>Z/Y/m</u> (time).
nn ia r	tui Harch	el MM	Tur H	echel
Printed Name	of Sheriff or Server		Signature of Sh	eriff or Server
		otary public if not served by an authorize	ea onicer: 202e)	(date).
(Seal)	Subscribed and sworn to	beiore me on	200000	la R
(4-47)	My commission expires		Not	ary Public
Ob with Fara it and a shi		Date	28V84	
Sheriff's Fees, if applicable	र रू		"ANITOR"	SKELBY ROBERTS

Summons

Non Est

Sheriff's Deputy Salary Supplemental Surcharge

Mileage

10.00

per mile) miles @ \$.

My Commission Expires January 28, 2023 St. Louis County

Commission #19503579

A copy of the summons and a copy of the petition must be served on each defendant/respondent. For methods of service on all

Total

classes of suits, see Supreme Court Rule 54.

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SHELBY ROBERTS My Commission Expires January 28, 2023 St Louis County Commission #19503579



State of Missouri

County of Saint Louis (City)

Circuit Court

Case Number: 2022-CC09988

Plaintiff/Petitioner:

TINA POYNTER-ABELL, as Spouse of and on behalf of Decedent

ROBERT ABELL

VS.

Defendant/Respondent: 3M COMPANY, et al.

Received by HPS Process Service & Investigations to be served on UTC Fire and Security Americas Corporation, Inc. c/o CT Corporation System, 120 South Central Avenue, Clayton, MO 63105.

I, MARTIN HUECKEL, being duly sworn, depose and say that on the 1st day of October, 2020 at 2:14 pm, 1:

Served the within named with a true copy of the Summons in Civil Case; and Petition by leaving with Bonnie Love, POS Intake Specialist at 120 South Central Avenue, Clayton, MO 63105.

I am over the age of eighteen, and have no interest in the above action.

Subscribed and Sworn to before me on the day of Colom 2000 by the affiant by the affiant who

is personally known to me

SHELBY ROBERTS My Commission Expires January 28, 2023 St. Louis County

HPS Process Service & Investigations www.hpsprocess.com 1669 Jefferson Kansas City, MO 64108

mathis Hickel

(800) 796-9559

MARTIN HUECKEL **Process Server**

Our Job Serial Number: HAT-2020018882

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Commission #19503579
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SHELLY ROBERTS My Commission Expire: January 28, 2023 St. Louis County Commission #19503579

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Judge or Division:	Case Number: 2022-CC09988	
REX M BURLISON		
Plaintiff/Petitioner: TINA POYNTER-ABELL	Plaintiff's/Petitioner's Attorney/Address ANDREW KELLEY SMITH SUITE 400 221 W LEXINGTON	
Defendant/Respondent: 3M COMPANY	vs. INDEPENDENCE, MO 64051 Court Address: CIVIL COURTS BUILDING	
Nature of Suit: CC Wrongful Death	10 N TUCKER BLVD SAINT LOUIS, MO 63101	(Date File Stamp)
	Summons in Civil Case	
The State of Missouri to: UTC FIRE Alias:	AND SECURITY AMERICAS CORPORATION INC	

3M COMPANY	***************************************	AN THOUTE PLVD		
		10 N TUCKER BLVD		
CC Wrongful Death		SAINT LOUIS, MO 63101		(Date File Stamp)
		mmons in Civil Case		
The State of Missouri to:	UTC FIRE AND SEC	CURITY AMERICAS CORPORAT	ION INC	
	Alias:			
CT CORPORATION SYSTEM, R				· · · · · · · · · · · · · · · · · · ·
120 SOUTH CENTRAL AVENUE			STLOUIS	COUNTY SHERIFF
CLAYTON, MO 63105				
COURT SEAL OF	You are summone	d to appear before this court an	d to file your p	leading to the petition, a
COURTOR	conv of which is at	fached, and to serve a copy of	your pleading	upon the amorney for
	plaintiff/petitioner	at the above address all within	30 days after r	eceiving this summons,
[2(/JESET)[2]	exclusive of the da	y of service. If you fall to file yo	our pleading, ju	lagment by delault may
(3)	be taken against y	ou for the relief demanded in th	e petition.	
Metelo	September 28,	2020	Lower May	ngringer
CITY OF ST LOUIS	September 20,	<u></u>	. /	9 0
	Date		Clerk	
	Further Information:			
	91	neriff's or Server's Return		
Note to serving officer:	Summons should be retu	med to the court within 30 days after	the date of issue.	
I certify that I have served	I the above summons by:	: (check one)		
		file mattion to the defendant/respon	dent.	infondant/seepandant with
leaving a copy of the s	ummons and a copy of the	ne petition at the dwelling place or usi ne perition at the dwelling place or usi ne person of the defe		ent's family over the age of
WHO. P.	مام مراه طفاند مرامات	fondant/respondent	ildani on coponia	
15 years who perman	rently resides with the de ration) delivering a CODV	of the summons and a copy of the co	mplaint to:	
Marking Service on Each	nce Cove	of the summons and a copy of the co	ce spec	· (title).
nother:				
	c - / /	1. a alauton no	0 63/05	- (address)
Served at 120	S. Central	BUC, CIRGION, TIL	12 110	to at 214 and (time)
in ST Couis	(County/Ci	Ave, Clayton, Mo ty of St. Louis), MO, on 10/1	120 20 (Uzi	te) at 27 / flor
	1 - 11 /	2 Marti	or Harce	KD
Man				eriff or Server
Printed Name	Must be sworn before a n	otary public if not served by an authori	zed officer:	
	Subscribed and sworn to	o before me on	2020	(date).
(Seal)		1122122	00 000 5	Zihor
	My commission expires	:	Not	ary Public
	***************************************	Date		
Sheriff's Fees, if applicab	le _		NAY PUBL	SHELBY ROBERTS My Commission Expires
Summons	\$		NOTARY	January 28, 2023
Non Est	\$		SEAL S	St. Louis County
Sheriff's Deputy Salary	\$ 10.00		OF ME	Commission #19503579
Supplemental Surcharge	¢ 10.00	miles @ \$ per mile)	with.	
Mileage	\$C			
Total	d a copy of the natition m	oust be served on each defendant/res	pondent. For me	thods of service on all
A copy of the summons an classes of suits, see Supre	me Court Rule 54.			
CIGOGO OF SURE COS SUPE				

SHELBY ROBERTS My Commission Expires January 28, 2023 St Louis County Commission #19503579





TOCKE CA.			
Judge or Division: REX M BURLISON		Case Number: 2022-CC09988	
Plaintiff/Petitioner: TINA POYNTER-ABELL		Plaintiff's/Petitioner's Attorney/Addr ANDREW KELLEY SMITH SUITE 400	ess:
	vs.	221 W LEXINGTON INDEPENDENCE, MO 64051	
Defendant/Respondent: 3M COMPANY		Court Address: CIVIL COURTS BUILDING 10 N TUCKER BLVD	(Date File Stamp)
Nature of Suit: CC Wrongful Death		SAINT LOUIS, MO 63101	
Sı		al Service Outside the State cept Attachment Action)	of Missouri
The State of Missouri to:	BUCKEYE FIRE EQUIPM		
A HAON CORPORATE AGEN 29225 CHAGRIN BLVD STE 3 PEPPER HILE, OH 44122	350		
COURT SEAL OF	which is attached, and the plaintiff/petitioner at the you, exclusive of the date.	appear before this court and to file you serve a copy of your pleading upon above address all within 30 days afay of service. If you fail to file your place relief demanded in this action.	n the attorney for the ter service of this summons upon
CITY OF ST LOUIS	Date Further Information:		Clerk
2. My official title is 3. I have served the a	serve process in civil action bove summons by: (check py of the summons and a co of the summons and a cop condent with f 15 years who permanently	cone) copy of the petition to the defendant/resp by of the petition at the dwelling place or, a person of y resides with the defendant/respondent copy of the summons and a copy of the	ondent. usual abode of the the defendant's/respondent's family
other:			
Served at			
in	County,	(state), on	(date) at (time).
Printed Nat	I am: (check one)	before me this(day) he clerk of the court of which affiant is an he judge of the court of which affiant is a authorized to administer oaths in the stat summons. (use for out-of-state officer) authorized to administer oaths. (use for	n officer. n officer. e in which the affiant served the above
		·	Signature and Title
Service Fees Summons \$ Non Est \$ Mileage \$ Total \$	See the following page for di	miles @ \$ per mile)	

2:21-cv-00365-RMG Date Filed 11/02/20 Entry Number 1-1 Page 90 of 103

Directions to Officer Making Return on Service of Summons

A copy of the summons and a copy of the motion must be served on each defendant/respondent. If any defendant/respondent refuses to receive the copy of the summons and motion when offered, the return shall be prepared accordingly so as to show the offer of the officer to deliver the summons and motion and the defendant's/respondent's refusal to receive the same.

Service shall be made: (1) On Individual. On an individual, including an infant or incompetent person not having a legally appointed guardian, by delivering a copy of the summons and motion to the individual personally or by leaving a copy of the summons and motion at the individual's dwelling house or usual place of abode with some person of the family over 15 years of age who permanently resides with the defendant/respondent, or by delivering a copy of the summons and petition to an agent authorized by appointment or required by law to receive service of process; (2) On Guardian. On an infant or incompetent person who has a legally appointed guardian, by delivering a copy of the summons and motion to the guardian personally; (3) On Corporation, Partnership or Other Unincorporated Association. On a corporation, partnership or unincorporated association, by delivering a copy of the summons and motion to an officer, partner, or managing or general agent, or by leaving the copies at any business office of the defendant/respondent with the person having charge thereof or by delivering copies to its registered agent or to any other agent authorized by appointment or required by law to receive service of process; (4) On Public or Quasi-Public Corporation or Body. Upon a public, municipal, governmental or quasi-public corporation or body in the case of a county, to the mayor or city clerk or city attorney in the case of a city, to the chief executive officer in the case of any public, municipal, governmental, or quasi-public corporation or body or to any person otherwise lawfully so designated.

Service may be made by an officer or deputy authorized by law to serve process in civil actions within the state or territory where such service is made.

Service may be made in any state or territory of the United States. If served in a territory, substitute the word "territory" for the word "state."

The office making the service must swear an affidavit before the clerk, deputy clerk, or judge of the court of which the person is an officer or other person authorized to administer oaths. This affidavit must state the time, place, and manner of service, the official character of the affiant, and the affiant's authority to serve process in civil actions within the state or territory where service is made.



Judge or Division: REX M BURLISON	Case Number: 2022-CC09988		
Plaintiff/Petitioner: TINA POYNTER-ABELL vs.	Plaintiff's/Petitioner's Attorney/Address: ANDREW KELLEY SMITH SUITE 400 221 W LEXINGTON INDEPENDENCE, MO 64051		
Defendant/Respondent: 3M COMPANY Nature of Suit: CC Wrongful Death	Court Address: CIVIL COURTS BUILDING 10 N TUCKER BLVD SAINT LOUIS, MO 63101	(Date File St	amp)
	nal Service Outside the State of Mi	ssouri	
The State of Missouri to: CHEMGUARD, INC. Alias: CT CORPORATION SYSTEM, RAGT 1999 BRYAN STREET STE 900 DALLAS, TX 75201 COURT SEAL OF Which is attached, and plaintiff/petitioner at the you, exclusive of the dataken against you for the September 2	appear before this court and to file your pleato serve a copy of your pleading upon the a above address all within 30 days after servay of service. If you fail to file your pleading, be relief demanded in this action.	ttorney for the vice of this summo	ns upon
CITY OF ST LOUIS Date Further Information:		Clerk	
I certify that: 1. I am authorized to serve process in civil action 2. My official title is 3. I have served the above summons by: (check delivering a copy of the summons and a copy of the summons and a copy defendant/respondent with over the age of 15 years who permanently (for service on a corporation) delivering a	cone) copy of the petition to the defendant/respondent. by of the petition at the dwelling place or usual at , a person of the defe	ounty,oode of the endant's/respondent	(state).
other:			·
Served at			(address)
inCounty,	(state), on(date) at	(time).
I am: (check one)	before me this	ch the affiant served	
Total \$	miles @ \$ per mile) rections to officer making return on service of sun		

Directions to Officer Making Return on Service of Summons

A copy of the summons and a copy of the motion must be served on each defendant/respondent. If any defendant/respondent refuses to receive the copy of the summons and motion when offered, the return shall be prepared accordingly so as to show the offer of the officer to deliver the summons and motion and the defendant's/respondent's refusal to receive the same.

Service shall be made: (1) On Individual. On an individual, including an infant or incompetent person not having a legally appointed guardian, by delivering a copy of the summons and motion to the individual personally or by leaving a copy of the summons and motion at the individual's dwelling house or usual place of abode with some person of the family over 15 years of age who permanently resides with the defendant/respondent, or by delivering a copy of the summons and petition to an agent authorized by appointment or required by law to receive service of process; (2) On Guardian. On an infant or incompetent person who has a legally appointed guardian, by delivering a copy of the summons and motion to the guardian personally; (3) On Corporation, Partnership or Other Unincorporated Association. On a corporation, partnership or unincorporated association, by delivering a copy of the summons and motion to an officer, partner, or managing or general agent, or by leaving the copies at any business office of the defendant/respondent with the person having charge thereof or by delivering copies to its registered agent or to any other agent authorized by appointment or required by law to receive service of process; (4) On Public or Quasi-Public Corporation or Body. Upon a public, municipal, governmental or quasi-public corporation or body in the case of a county, to the mayor or city clerk or city attorney in the case of a city, to the chief executive officer in the case of any public, municipal, governmental, or quasi-public corporation or body or to any person otherwise lawfully so designated.

Service may be made by an officer or deputy authorized by law to serve process in civil actions within the state or territory where such service is made.

Service may be made in any state or territory of the United States. If served in a territory, substitute the word "territory" for the word "state."

The office making the service must swear an affidavit before the clerk, deputy clerk, or judge of the court of which the person is an officer or other person authorized to administer oaths. This affidavit must state the time, place, and manner of service, the official character of the affiant, and the affiant's authority to serve process in civil actions within the state or territory where service is made.



Judge or Division: REX M BURLISON		Case Number: 2022-CC09988	
Plaintiff/Petitioner: TINA POYNTER-ABELL		Plaintiff's/Petitioner's Attorney/Add ANDREW KELLEY SMITH SUITE 400 221 W LEXINGTON	ess:
D.C. I. UD	VS.	INDEPENDENCE, MO 64051	(0.151.01)
Defendant/Respondent: 3M COMPANY		Court Address: CIVIL COURTS BUILDING	(Date File Stamp)
Nature of Suit:		10 N TUCKER BLVD	
CC Wrongful Death		SAINT LOUIS, MO 63101	CHRIT
Sı		nal Service Outside the State except Attachment Action)	ot iviissouri
The State of Missouri to: LITTLETON ROAD Aberdeen City ASHFORD, TW15 1TZ	CHUBB FIRE, LTD/ CHU	JBB FIRE & SECURITY LTD Y, PLC/RED HAWK FIRE & SECURITY	LLC
COURT SEAL OF	which is attached, and a plaintiff/petitioner at the you, exclusive of the da	appear before this court and to file y to serve a copy of your pleading upon above address all within 30 days are of service. If you fail to file your place relief demanded in this action.	n the attorney for the ter service of this summons upon
Cit i Or 31 200i3	Date Further Information:		Clerk
2. My official title is	serve process in civil actionabove summons by: (check by of the summons and a corporate with	cone) copy of the petition to the defendant/respoy of the petition at the dwelling place or, a person of y resides with the defendant/respondent copy of the summons and a copy of the (name)	County, (state). condent. usual abode of the the defendant's/respondent's family petition to (title).
Served at		(-1-1-)	(date) at (time).
in	County,	(state), on	(date) at (time).
Printed Na	I am: (check one)	before me this (day) he clerk of the court of which affiant is a he judge of the court of which affiant is a authorized to administer oaths in the stat summons. (use for out-of-state officer) authorized to administer oaths. (use for	n officer. In officer. e in which the affiant served the above
			Signature and Title
Service Fees Summons \$ Non Est \$ Mileage \$ Total \$	(miles @ \$ per mile)	

2:21-cv-00365-RMG Date Filed 11/02/20 Entry Number 1-1 Page 94 of 103

See the following page for directions to officer making return on service of summons.

Directions to Officer Making Return on Service of Summons

A copy of the summons and a copy of the motion must be served on each defendant/respondent. If any defendant/respondent refuses to receive the copy of the summons and motion when offered, the return shall be prepared accordingly so as to show the offer of the officer to deliver the summons and motion and the defendant's/respondent's refusal to receive the same.

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Judge or Division: REX M BURLISON	Case Number: 2022-CC09988	
Plaintiff/Petitioner: TINA POYNTER-ABELL	Plaintiff's/Petitioner's Attorney/Address: ANDREW KELLEY SMITH SUITE 400 221 W LEXINGTON	
Defendant/Respondent: 3M COMPANY	INDEPENDENCE, MO 64051 Court Address: CIVIL COURTS BUILDING 10 N TUCKER BLVD	(Date File Stamp)
Nature of Suit: CC Wrongful Death	SAINT LOUIS, MO 63101	
Summons for Person	nal Service Outside the State of Misso Except Attachment Action)	ouri
which is attached, and plaintiff/petitioner at the you, exclusive of the d taken against you for to september of the detailed	appear before this court and to file your pleading to serve a copy of your pleading upon the attorne above address all within 30 days after service ay of service. If you fail to file your pleading, judghe relief demanded in this action.	ney for the of this summons upon
 2. My official title is	k one) copy of the petition to the defendant/respondent. py of the petition at the dwelling place or usual abode, a person of the defenda tly resides with the defendant/respondent. a copy of the summons and a copy of the petition to (name)	of the
Served at		(address)
inCounty,	(state), on (date)	at (time).
I am: (check one)	Signature of S before me this (day) the clerk of the court of which affiant is an officer. the judge of the court of which affiant is an officer. authorized to administer oaths in the state in which the summons. (use for out-of-state officer) authorized to administer oaths. (use for court-appoint Signature and	e affiant served the above ted server)
Total \$	miles @ \$ per mile)	

Directions to Officer Making Return on Service of Summons

A copy of the summons and a copy of the motion must be served on each defendant/respondent. If any defendant/respondent refuses to receive the copy of the summons and motion when offered, the return shall be prepared accordingly so as to show the offer of the officer to deliver the summons and motion and the defendant's/respondent's refusal to receive the same.

Service shall be made: (1) On Individual. On an individual, including an infant or incompetent person not having a legally appointed guardian, by delivering a copy of the summons and motion to the individual personally or by leaving a copy of the summons and motion at the individual's dwelling house or usual place of abode with some person of the family over 15 years of age who permanently resides with the defendant/respondent, or by delivering a copy of the summons and petition to an agent authorized by appointment or required by law to receive service of process; (2) On Guardian. On an infant or incompetent person who has a legally appointed guardian, by delivering a copy of the summons and motion to the guardian personally; (3) On Corporation, Partnership or Other Unincorporated Association. On a corporation, partnership or unincorporated association, by delivering a copy of the summons and motion to an officer, partner, or managing or general agent, or by leaving the copies at any business office of the defendant/respondent with the person having charge thereof or by delivering copies to its registered agent or to any other agent authorized by appointment or required by law to receive service of process; (4) On Public or Quasi-Public Corporation or Body. Upon a public, municipal, governmental or quasi-public corporation or body in the case of a county, to the mayor or city clerk or city attorney in the case of a city, to the chief executive officer in the case of any public, municipal, governmental, or quasi-public corporation or body or to any person otherwise lawfully so designated.

Service may be made by an officer or deputy authorized by law to serve process in civil actions within the state or territory where such service is made.

Service may be made in any state or territory of the United States. If served in a territory, substitute the word "territory" for the word "state."

The office making the service must swear an affidavit before the clerk, deputy clerk, or judge of the court of which the person is an officer or other person authorized to administer oaths. This affidavit must state the time, place, and manner of service, the official character of the affiant, and the affiant's authority to serve process in civil actions within the state or territory where service is made.



Judge or Division: REX M BURLISON		Case Number: 2022-CC09988	
Plaintiff/Petitioner: TINA POYNTER-ABELL		Plaintiff's/Petitioner's Attorney/Address: ANDREW KELLEY SMITH	
	VS.	SUITE 400 221 W LEXINGTON INDEPENDENCE, MO 64051	
Defendant/Respondent: 3M COMPANY		Court Address: CIVIL COURTS BUILDING	(Date File Stamp)
Nature of Suit: CC Wrongful Death		10 N TUCKER BLVD SAINT LOUIS, MO 63101	
Sı		nal Service Outside the State of Mixcept Attachment Action)	ssouri
The State of Missouri to: CORPORATE SYSTEMS LLC 3500 S DUPONT HIGHWAY DOVER, DE 19901 COURT SEAL OF CITY OF ST LOUIS	You are summoned to a which is attached, and plaintiff/petitioner at the you, exclusive of the da	appear before this court and to file your pleato serve a copy of your pleading upon the at above address all within 30 days after servay of service. If you fail to file your pleading, he relief demanded in this action.	ttorney for the rice of this summons upon
		or Server's Affidavit of Service	
2. My official title is 3. I have served the a	serve process in civil action above summons by: (check py of the summons and a co of the summons and a cop condent with f 15 years who permanently	ns within the state or territory where the above succession of Cone) copy of the petition to the defendant/respondent. by of the petition at the dwelling place or usual above y resides with the defendant/respondent. copy of the summons and a copy of the petition	pode of the endant's/respondent's family
othor:		(name)	(title).
_			(address)
in		(state), on (c	
Printed Nar	I am: (check one)	before me this (day)	ch the affiant served the above
		Signature	and Title
Service Fees Summons \$ Non Est \$ Mileage \$ Total \$		miles @ \$ per mile) irections to officer making return on service of sun	omons
	caa tha tallawing naga tar di	recoons to officer maxing feturifion Service Of Suff	

2:21-cv-00365-RMG Date Filed 11/02/20 Entry Number 1-1 Page 98 of 103

Directions to Officer Making Return on Service of Summons

A copy of the summons and a copy of the motion must be served on each defendant/respondent. If any defendant/respondent refuses to receive the copy of the summons and motion when offered, the return shall be prepared accordingly so as to show the offer of the officer to deliver the summons and motion and the defendant's/respondent's refusal to receive the same.

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Judge or Division: REX M BURLISON	Case	Number: 2022-CC09988		
Plaintiff/Petitioner: TINA POYNTER-ABELL	ANDF SUITE 221 V	ff's/Petitioner's Attorney/A EW KELLEY SMITH E 400 / LEXINGTON PENDENCE, MO 64051	Address:	
Defendant/Respondent: 3M COMPANY Nature of Suit: CC Wrongful Death	Court CIVIL 10 N	Address: COURTS BUILDING FUCKER BLVD FLOUIS, MO 63101		(Date File Stamp)
		rvice Outside the Sta Attachment Action)	ate of Missour	İ
Alias: THE CORPORATION TRUST COMPANY 1209 ORANGE STREET WILMINGTON, DE 19801 COURT SEAL OF Which is a plaintiff/p you, exclutaken again.	summoned to appear attached, and to serve etitioner at the above usive of the day of se	before this court and to file a copy of your pleading address all within 30 days rvice. If you fail to file your demanded in this action.	upon the attorney to after service of the	for the nis summons upon
CITY OF ST LOUIS Further Info	Date		Clerk	7-7-
leaving a copy of the sum defendant/respondent with over the age of 15 years with the formula of the sum over the age of 15 years with the service on a corporation.	nons by: (check one) Immons and a copy of the mons and a copy of	he petition to the defendant/r petition at the dwelling place, a persor s with the defendant/respond the summons and a copy of (name)	he above summons County, espondent. or usual abode of the defendant's/lent. the petition to	(state).
				(address)
Served atin				
Printed Name of Sheriff Subscribed I am: (ch	I and sworn to before a seck one)	me this (day) _ of the court of which affiant is e of the court of which affiant ed to administer oaths in the s s. (use for out-of-state office) ed to administer oaths. (use	s an officer. is an officer. state in which the aff r) for court-appointed s	onth) (year). fiant served the above server)
Service Fees Summons \$ Non Est \$ Mileage \$ Total \$ See the follo		_miles @ \$ per miles to officer making return on se		

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Directions to Officer Making Return on Service of Summons

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A Committee of the Comm				
Judge or Division: REX M BURLISON	Case Number: 2022-CC09988	Special Process Server 1		
Plaintiff/Petitioner: TINA POYNTER-ABELL	Plaintiff's/Petitioner's Attorney/Address: ANDREW KELLEY SMITH SUITE 400 221 W LEXINGTON S. INDEPENDENCE, MO 64051	Special Process Server 2 Special Process Server 3		
Defendant/Respondent: 3M COMPANY	Court Address: CIVIL COURTS BUILDING	(Date File Stamp)		
Nature of Suit: CC Wrongful Death	10 N TUCKER BLVD SAINT LOUIS, MO 63101			
Summons for Personal Service Outside the State of Missouri (Except Attachment Action)				
,	D/ CHUBB FIRE & SECURITY LIMITED RITY, PLC/RED HAWK FIRE & SECURITY LLC TONAL FOAM INC			
CHUBB FIRE LIMITED LITTLETON ROAD ASHFORD, MIDDLESEX, ENGLAND				

COURT SEAL OF



CITY OF ST LOUIS

You are summoned to appear before this court and to file your pleading to the petition, copy of which is attached, and to serve a copy of your pleading upon the attorney for the plaintiff/petitioner at the above address all within 30 days after service of this summons upon you, exclusive of the day of service. If you fail to file your pleading, judgment by default will be taken against you for the relief demanded in this action.

September 30, 2020

Further Information:

Officar's	or Server's	Affidavit	of Sarvica
Officer's	or Server's	Amidavit	of Service

		Officer's or Sei	rver's Affidavit of Servic	e	
I cer	rtify that:				
1. 2.	I am authorized to serve proces My official title is I have served the above summo				
3.	delivering a copy of the sum leaving a copy of the summ defendant/respondent with over the age of 15 years where the 15 years where the 15 years where the 15 years where the 15 years where the 15 years where the 15 years where the 15 years where the 15 years where the 15 years where the 15 years where the 15 years where the 15 years where 15 years where 15 years where the 15 years where 15 years where 15 years where 15 years where	nmons and a copy of ons and a copy of the no permanently reside n) delivering a copy of	the petition to the defendant/ petition at the dwelling plac, a perso s with the defendant/respond the summons and a copy of (name)	respondent. e or usual abode of the on of the defendant's/responder dent.	nt's family (title).
Serv	ved at				
	Printed Name of Sheriff or Subscribed		me this (day)	Signature of Sheriff or Server (month)	(year).
		ck one)	of the court of which affiant e of the court of which affiant	is an officer. is an officer. state in which the affiant serve er) for court-appointed server)	
				Signature and Title	

2'21-cv-00365-RMG	Date Filed 17/02/20 Fifty Number 1-1 Page 102 of 103				
Service Fees					
Summons \$					
Non Est \$					
Mileage \$	(miles @ \$ per mile)				
Total \$					
See the following page for directions to officer making return on service of summons.					

Directions to Officer Making Return on Service of Summons

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IN THE 22ND	JUDICIAL CIRC	JIT, CITY OF ST LOUIS,	MISSOURI	
Judge or Division: REX M BURLISON		Case Number: 2022-CC099	88	
Plaintiff/Petitioner: TINA POYNTER-ABELL	vs.	Plaintiff's/Petitioner's Attorner ANDREW KELLEY SMITH SUITE 400 221 W LEXINGTON INDEPENDENCE, MO 6405	,	
Defendant/Respondent: 3M COMPANY		Court Address: CIVIL COURTS BUILDING 10 N TUCKER BLVD		
Nature of Suit: CC Wrongful Death		SAINT LOUIS, MO 63101		File Stamp)
		nmons in Civil Case		
The State of Missouri to: CSC LAWYERS INC SERVICES 221 BOLIVAR STREET JEFFERSON CITY, MO 65101 COURT SEAL OF CITY OF ST LOUIS	You are summone copy of which is a plaintiff/petitioner exclusive of the da	d to appear before this court tached, and to serve a copy at the above address all with by of service. If you fail to file ou for the relief demanded in	and to file your pleading to of your pleading upon the a in 30 days after receiving the your pleading, judgment by the petition. Thomas Morphynger	ttorney for is summons,
	Date Further Information:	`	Clerk	
	Si	neriff's or Server's Return		
l certify that I have served ☐ delivering a copy of the ☐ leaving a copy of the s	the above summons by e summons and a copy o ummons and a copy of the	f the petition to the defendant/res ne petition at the dwelling place or a person of the c	pondent.	pondent with ver the age of
15 years who perman	ently resides with the de ration) delivering a copy	of the summons and a copy of the (name)	complaint to:	(title).
☐ other:				 •
Served at				(address)
in	(County/Ci	ty of St. Louis), MO, on		
Printed Name (Seal)		otary public if not served by an aut		
1		Date	Notary Public	

Sheriff's Fees, if applicable

Summons

Non Est

Sheriff's Deputy Salary

Supplemental Surcharge

\$ Mileage

A copy of the summons and a copy of the petition must be served on each defendant/respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.

10.00

miles @ \$.____ per mile)